UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 13 2015

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7679 6453
RETURN RECEIPT REQUESTED

Mr. Mark Schlaikowski
Plant Engineer
Therm-Tech of Waukesha, Incorporated
301 Travis Lane
Waukesha, Wisconsin 53186

Re: Notice of Violation
Compliance Evaluation Inspection
WID988638656

Dear Mr. Schlaikowski:

On January 13, 2015, representatives of the U.S. Environmental Protection Agency and Wisconsin Department of Natural Resources (WDNR) inspected Therm-Tech of Waukesha, Inc. located in Waukesha, Wisconsin (hereinafter "Therm-Tech," "facility," or "you"). As a generator of hazardous waste, Therm-Tech is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq*. (RCRA). The purpose of the inspection was to evaluate Therm-Tech's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Therm-Tech, EPA's review of records pertaining to Therm-Tech, and the inspector's observations, EPA has determined that Therm-Tech violated RCRA requirements related to hazardous waste determinations and used oil as described in paragraphs 1 and 2, below.

1. Hazardous Waste Determination

Under Wis. Admin. Code § NR 662.011 [40 CFR § 262.11], a generator who generates a solid waste, as defined in Wis. Admin. Code § NR 661.02 [40 CFR § 261.2], must determine whether its waste is hazardous. The generator may determine if its waste is hazardous by using the following methods: 1) determine if the waste is excluded from regulation under s. NR 661.04 [40 CFR § 261.4], 2) determine if the waste is listed as hazardous waste in Subchapter D of Chapter NR 661 [Subpart D of 40 CFR Part 261], and 3) determine if the waste exhibits a characteristic of hazardous waste as identified in Subchapter C of Chapter

NR 661 [Subpart C of 40 CFR Part 261] by testing the waste or applying knowledge of the hazard characteristic of the waste in light of the materials or process used.

At the time of the inspection, Therm-Tech had not made a determination whether the waste aerosol cans generated in its Building 211 maintenance area were hazardous waste, and the cans were being disposed with general refuse without being punctured or recycled.[1] Therm-Tech, therefore, is in violation of the abovementioned requirement.

2. Used Oil Requirements

Under Wis. Admin. Code § NR 679.22(3)(a) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

At the time of the inspection, a 55-gallon drum near the vacuum furnaces in Building 305, two totes in Building 303, one tote in Building 211, and two totes and one 55-gallon drum at the 1511 Pearl Street location that contained used oil were not labeled with the words, "Used Oil." Therm-Tech, therefore, is in violation with the abovementioned requirement for used oil generators.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above requirements. You should submit your response to Brian Kennedy, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Brian Kennedy, of my staff, at (312) 353-4383 or at kennedy.brian@epa.gov.

Sincerely,

for Gary J. Victorine, Chief
RCRA Branch

Enclosures

cc: Randall Malek, WDNR, randall.malek@wisconsin.gov
Michael Ellenbecker, WDNR, michael.ellenbecker@wisconsin.gov

[1] Please see the enclosed guidance documents on management options for waste aerosol cans, as well as http://dnr.wi.gov/topic/Waste/HazardousFAQ.html.

9442.1993(02)

United States Environmental Protection Agency
Washington, D.C. 20460
Office of Solid Waste and Emergency Response

October 7, 1993

Mr. Gregory L. Crawford
Vice President, Recycling Operations
Steel Recycling Institute
Foster Plaza X
680 Anderson Drive
Pittsburgh, Pennsylvania 15220

Dear Mr. Crawford:

Over the past several years we have received numerous questions concerning the regulatory status of used aerosol cans under the Resource Conservation and Recovery Act (RCRA) hazardous waste regulations. I understand that confusion about these issues may be hindering your efforts to increase steel aerosol can recycling in this country. As environmentally protective recycling is an important part of the Agency's waste management goals, I hope that this letter will help to answer some of these questions.

RESIDENTIAL AEROSOL CANS

First, I would like to emphasize that under the federal RCRA regulations, household waste (including aerosol cans) is excluded from the definition of hazardous waste (40 CFR 261.4(b)(1)). Thus, any aerosol cans generated by households are not regulated as hazardous waste. Because this exclusion attaches at the point of generation (i.e., the household) and combines to apply throughout the waste management cycle, household aerosol cans collected in municipal recycling programs and subsequently managed in recycling programs continue to be excluded from the hazardous waste management regulations.

The data you submitted (see footnote 1) appear to confirm that the majority of used residential aerosol cans contain very little residual product or propellant. Along with your experience working with many of the 600 or more communities currently recycling these

cans, the data suggest that aerosol cans can be effectively recycled. The Agency does recommend that communities running residential steel recycling programs educate their participants to recycle only empty steel aerosol cans. Participants could also be educated to: 1) purchase only the amount of consumer products that they need to minimize the quantities of unused products, 2) give unused products to someone else who can use them, 3) take unused or partially full containers to a household hazardous waste collection program if available, or 4) dispose of the partially full containers as directed on the label.

COMMERCIAL/INDUSTRIAL AEROSOL CANS

I understand that you are also interested in facilitating the recycling of aerosol cans generated by commercial or industrial generators. The remainder of this letter discusses only these non-household waste items.

We have been asked whether aerosol cans exhibit the characteristic of reactivity. At this time, the Agency is not able to determine whether various types of cans that may have contained a wide range of products are reactive. However, a steel aerosol can that does not contain a significant amount of liquid would clearly meet the definition of scrap metal (40 CFR 261.1(c)(6)), and thus would be exempt from RCRA regulation under 40 CFR 261.6(a)(3)(iv) if it were to be recycled. Therefore, a determination of reactivity or any other characteristic would not be relevant. Aerosol cans that have been punctured so that most of any liquid remaining in the can may flow from the can (e.g., at either end of the can), and drained (e.g., with punctules end down), would not contain significant liquids.

It should be noted that since the process of emptying the aerosol cans is part of a recycling process (i.e., scrap steel recycling), this activity would be exempt from RCRA regulation under 40 CFR 261.6(c) (except as specified in 40 CFR 261.6(d)). The Agency recommends that these activities be conducted in a safe and environmentally protective manner and that care be taken to properly manage any contents removed from the container (both liquids and gases). Any liquids or contained gases removed from aerosol cans may be subject to regulation as hazardous wastes if they are listed in Subpart D of 40 CFR Part 261 or if they exhibit any characteristics of hazardous waste as described in Subpart C of

40 CFR Part 261.

We have also been asked to determine whether used aerosol cans would meet the definition of "empty" under 40 CFR 261.7. Again, if the steel cans are being recycled, it is not necessary to determine whether they are "empty" under the criteria listed in 40 CFR 261.7. As long as an aerosol can being recycled does not contain significant liquids, the can is exempt as scrap metal. However, in order to dispose of a can as non-hazardous waste (rather than recycle it), a generator would have to determine that the can is empty under 40 CFR 261.7 (or that the product it contained was not hazardous), and that the can itself is not hazardous. If a can is to be disposed of, and either contains or is hazardous waste, it must be managed under all applicable regulations.

Please be aware that this letter addresses only the federal hazardous waste regulations. Authorized State agencies implement the RCRA program in their states (although some parts of the program may be implemented by the U.S. EPA Regions), and that state regulations may be more stringent than the federal regulations. Anyone managing aerosol cans should contact the appropriate state environmental agency or U.S. EPA Regional Office to determine how the regulations of that particular state will apply to their activities.

I hope this information is useful in your efforts to increase steel recycling. Thank you for the assistance that you and the Steel Recycling Institute have provided my staff in researching these issues. If you have any further questions, please call Charlotte Mooney of my staff at (202) 260-8551.

Sincerely,
Jeffrey D. Denit
Acting Director
Office of Solid Waste

cc: Waste Management Division Directors,
U.S. EPA Regions I - X

1 Texas Steel Aerosol Can Recycling Program, Final Report; Steel Can Recycling Institute (now Steel Recycling Institute), December 7, 1992.

9442.1994(01)

United States Environmental Protection Agency
Washington, D.C. 20460
Office of Solid Waste and Emergency Response

January 4, 1994

Mr. Michael C. Campbell
Katec Incorporated
P.O. Box 3399
Virginia Beach, Virginia 23454

Dear Mr. Campbell:

Thank you for your letter of November 12, 1993, commenting on our letter of October 7, 1993, concerning regulation of waste aerosol cans under the Resource Conservation and Recovery Act (RCRA) hazardous waste regulations. We appreciate your interest in the safe and environmentally protective management of these wastes.

As we indicated in our letter, we are not at this time able to make a categorical determination as to whether various types of cans that may have contained a wide range of products exhibit the characteristic of reactivity. It remains the responsibility of the generator of any particular waste to make this determination (see 40 CFR 262.11). However, as we indicated in the letter, a steel aerosol can that does not contain a significant amount of liquid (e.g., a can that has been punctured and drained) would meet the definition of scrap metal (40 CFR 261.1(c)(6)), and, if it is to be recycled, would be exempt from regulation under 40 CFR 261.6(a)(3)(iv). Scrap metal that is recycled is exempt from RCRA regulation under this provision even if it is hazardous waste, so generators need not make a hazardous waste determination. Scrap metal that is not recycled, however, is subject to the hazardous waste regulations if it is hazardous, so generators must make a hazardous waste determination.

We appreciate your safety concerns and stress that persons managing both regulated wastes and wastes that are exempt under recycling exemptions should take all necessary precautions to ensure that the wastes are managed safely. Thank you again for your interest in this issue.

Sincerely,
Michael H. Shapiro
Director
Office of Solid Waste

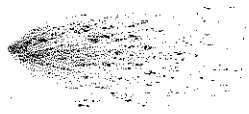
U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 5, Land and Chemicals Division
RCRA Branch, LR-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSPECTION DATE:	January 13, 2015
SITE NAME:	Therm-Tech of Waukesha, Inc.
ADDRESS:	301 Travis Lane Waukesha, Wisconsin 53186
EPA ID NUMBER:	WID988638656
GENERATOR STATUS:	Large Quantity Generator (2014) Conditionally Exempt Small Quantity Generator (2015)
NAICS CODE:	332811 Metal Heat Treating
FACILITY CONTACT:	Mark Schlaikowski Plant Engineer
EPA INSPECTOR:	Brian Kennedy Environmental Engineer Compliance Section 2 RCRA Branch Land and Chemicals Division

PREPARED BY: Brian Kennedy — **Brian Kennedy** — 1/28/2015 — **Date**

ACCEPTED BY: — **Julie Morris, Chief**
Compliance Section 2 — 2/6/15 — **Date**



Purpose of Inspection

An unannounced Compliance Evaluation Inspection (CEI) of Therm-Tech of Waukesha, Inc. (hereinafter "Therm-Tech" or "facility") located at 301 Travis Lane, Waukesha, Wisconsin took place on January 13, 2015. The CEI was conducted by U.S. Environmental Protection Agency and Wisconsin Department of Natural Resources (WDNR) personnel and was an evaluation of the facility's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA) and its implementing regulations found in the Wisconsin Administrative Code and the Code of Federal Regulations. More specifically, the CEI was an evaluation of Therm-Tech's compliance with the regulations governing generators of hazardous waste.

Participants

The following persons were present for part or all of the inspection:

Mark Schlaikowski – Plant Engineer	Therm-Tech
Mary Beth Wiberg-Springer – Executive Vice President and General Manger	Therm-Tech
Randall Malek – Waste Management Specialist	WDNR
Brian Kennedy – Environmental Engineer	U.S. EPA

Introduction

I arrived on site at 9:00 AM CST and met with Randall Malek outside of Therm-Tech's main office. Mr. Malek and I entered and introduced ourselves to the receptionist and requested to see a facility environmental coordinator or safety manager. A few minutes later we were introduced to Mary Beth Wiberg-Springer, Therm-Tech's Executive Vice President and General Manager and Mark Schlaikowski, Therm-Tech's Plant Engineer. Randall and I were led to an office to proceed with an opening conference with Ms. Wiberg-Springer, Mr. Schlaikowski, and several other Therm-Tech representatives. I presented Ms. Wiberg-Springer my enforcement officer credentials and business card and provided the Small Business Resources information and Pollution Prevention contact sheets. I described the purpose of the U.S. EPA RCRA inspection and the process by which I would conduct the inspection, including a facility walk-through which would include photographs of hazardous waste storage areas, as well as a review of Therm-Tech records pertaining to hazardous waste.

I informed Therm-Tech of their right to make a confidential business information claim over the information and documents collected during the inspection.

Site Description

The following information about Therm-Tech is based on personal observations of the EPA inspector and on representations made during the inspection by facility personnel identified above or within the text unless otherwise specified.

Opened in May of 1982, Therm-Tech specializes in a variety of heat treating processes for steel castings and forgings, machined parts and stampings, gears, aluminum and weldments. Therm-Tech heat treats metal parts for upwards of 600 different customers, utilizing special furnaces

and cooling (quenching) techniques to transform the physical properties of the metal such as hardness and brittleness. Therm-Tech serves industries such as oil and gas extraction, trucking, and other heavy equipment manufacturers. Heat treating and other processes available at Therm-Tech include stress relieving, annealing, normalizing, water, oil and polymer quenching and hardening, marquench hardening, vacuum hardening, carburization, nitriding, austempering, cryogenic treatment, straightening, shot blasting, and mechanical testing. Therm-Tech currently has 143 employees and operates 24 hours a day, seven days a week on a three shift schedule.

Therm-Tech's location on Travis Lane is comprised of Building 301, which incorporates a main office and general casting and forging heat treatment processes; Building 303, which houses Allcase heat treating furnaces; Building 305, which houses vacuum furnaces and nitriding processes; and Building 211, which is a general maintenance shop and storage area. Several years ago, Therm-Tech also leased a second production building at 1511 Pearl Street in Waukesha, approximately 3.3 miles northwest from the Travis Lane location. The Pearl Street location houses air cooling operations, additional Allcase furnaces, and general warehouse space.

Therm-Tech generates hazardous waste in the form of spent hydrochloric acid and caustic solutions from the nitriding process in Building 305. The acidic and caustic solution baths are changed out infrequently, approximately once every several years, and are characterized as D002 hazardous waste when disposed. Hazardous waste is also generated as chromium-containing salt deposits that accumulate in wash tanks that are used to rinse off pieces that have undergone molten salt quenching. Treated pieces are dipped into wash tank water in steel baskets and any molten salt residue is dissolved away. Over time, salt deposits and residue accumulate in the bottom of the wash tanks. Several wash tanks are utilized around the facility to rinse pieces that have been quenched in molten salt; however, only the salt deposits from certain wash tanks have been characterized as D007 hazardous waste for chromium. Other wash tank salt deposits have been determined to be non-hazardous waste. Therm-Tech refers to its salt deposits as heat treat salts. Wastewaters generated in the wash tanks are discharged into the city sewer, along with other wastewaters and non-contact cooling waters generated throughout the facility. No wastewater is treated on site. Therm-Tech contracts with Advanced Waste Services to characterize, manage and ship its hazardous waste streams.

Other waste streams generated on site include used oil, aerosol cans, universal wastes and mineral spirits. Used oil is generated from several sources around Therm-Tech, including pumps from the vacuum furnaces in Building 305 and the Allcase furnace quench tanks in Building 303. The used oil is accumulated in 275-gallon totes or 55-gallon drums. When either of these containers are filled, they are moved to Building 211 for storage. Depending on the source of the used oil, whether from crankcase oil in forklifts or quenching oil from heat treating, some oil may be sent for reprocessing and returned to Therm-Tech while other is sent for general recycling. OSI Environmental picks up used oil generated by Therm-Tech. Waste aerosol cans are generated in the maintenance shop but are not managed as hazardous waste and are disposed with other trash. Universal wastes, primarily light bulbs, are taken to a nearby scrap yard soon after they are generated. Therm-Tech stated that the most recent light bulb installation around the facility included "green bulbs," or lamps that can be disposed with general refuse. A parts washer in Building 211 uses mineral spirits; however, the material has a high flash point.

Therm-Tech utilizes shot blasting in both Building 301 and the 1511 Pearl Street location to resurface pieces. The shot blasting process generates a waste dust that is collected in 55-gallon drums in an outdoor dust collector at Building 301. The shot blast dust is collected indoors in 55-gallon drums at the Pearl Street location. All drums of shot blast dust are consolidated and stored in a waste storage area in the east end of the Pearl Street facility. When enough drums are accumulated (approximately 40 55-gallon drums), Therm-Tech has the material picked up by PremierMetals, Inc. of Indianapolis, and sent to Connelly-GPM, Inc. of Chicago. Connelly-GPM uses Therm-Tech's shot blast dust as an ingredient in iron sponge, a gas purification product which removes hydrogen sulfide and mercaptan from various sulfur-containing gas sources. Therm-Tech has not had the shot blast dust tested or analyzed as a solid waste.

In addition to the shot blast dust, Therm-Tech also consolidates and stores its hazardous and non-hazardous salt deposits in the waste storage area at the Pearl Street location. Therm-Tech personnel transport any salt deposits generated at the Travis Lane location to the Pearl Street location on their own trucks for storage prior to pick up by Advanced Waste Services. The hazardous waste acid and caustic solutions generated in Building 305 remain at Travis Lane when they are picked up by Advanced Waste Services.

Therm-Tech employees use cellphones to communicate with each other. A personal address system installed at both Travis Lane and Pearl Street allows simultaneous communication between both locations. The Waukesha Fire Department frequently visits Therm-Tech for inspections and there are fire extinguishers available throughout the facility which are regularly monitored.

Facility Walk-Through

Mr. Schlaikowski led Mr. Malek and myself through the facility. We started first in Building 301, a general casting and forging treatment area that is adjacent to the main office. Inside Building 301 were several furnaces and molten salt quenching tanks. Mr. Schlaikowski briefly explained the molten salt quenching process and the wash tanks, where parts are dipped into water to rinse off salt residue. Mr. Schlaikowski pointed out one particular wash tank in the area, and stated that when salt deposits are removed from this tank they are characterized as hazardous waste for chromium. The wash tank is cleaned out approximately once a year as part of preventative maintenance. Water from the wash tanks is discharged directly to the sewer. Mr. Schlaikowski stated the City of Waukesha Water Department regularly visits the facility to test its discharge. In the southwest corner of Building 301 was a small shot blasting area where pieces are resurfaced. Ductwork attached to the blast area led to dust collector outside the southwest corner of the building. Underneath this dust collector were two 55-gallon drums collecting shot blast dust (See Photo 1 in Attachment A: Inspection Photographs).

The tour continued to Building 305, where Mr. Schlaikowski pointed out the five vacuum furnaces present in the northern half of the building. The furnaces are used to harden pieces within a vacuum and each furnace utilizes a pump to maintain that vacuum. The pumps generate used oil, and there were several oil drip buckets collecting free used oil in the area. When the buckets are filled, they are drained into a nearby 55-gallon drum (See Photo 2). The 55-gallon drum observed was not labeled as "Used Oil." Mr. Schlaikowski led the tour past several workstations and tooling areas to the southern half of Building 305 where nitriding takes place.

In the area were three sequential 400-gallon tanks in an in-ground concrete pit. Two of the tanks were the caustic and acidic solutions that, when disposed, are managed as D002 hazardous waste. The third tank is a neutral dip solution. Photo 3 displays the acid dip tank. Mr. Schlaikowski explained that these pretreatment tanks are used to clean and etch the surface of metal pieces prior undergoing gas nitriding. Adjacent to the tanks was the actually nitriding area, where heated pieces are exposed to ammonia to harden their surface.

Mr. Schlaikowski next led the tour to Building 303, where Therm-Tech houses six Allcase furnaces. The Allcase furnaces were described as "all-in-one" furnaces that are able to heat and oil quench pieces within one standalone unit. Mr. Malek and I observed several of the furnaces in the area heat and transfer batches of metal pieces. Each Allcase furnace has its own oil quench tank which is contained in an in-ground concrete pit. Spent quench oil is drained into one of two used oil totes in the area. One tote services the three larger Allcase furnaces, while the second tote is used for the three smaller furnaces (See Photos 4 and 5). The two totes were not labeled as "Used Oil." Mr. Schlaikowski stated the first tote was improperly labeled as "Propylene Glycol." I asked Mr. Schlaikowski about several 55-gallon drums in the area that had covers that appeared to be leading from the furnaces' quench tanks. He stated that these were "burp" drums which catch any quench oil that reacts violently with heated pieces when they are dipped. These drums are emptied back into the quench tank as needed.

The site tour continued to Building 211, a standalone maintenance and storage shop just west of Building 305. Inside was a small chemical and waste storage area that contained a tote of used oil that was waiting for shipment (See Photo 6). The tote was not labeled as "Used Oil," but instead was marked as "Virgin Oil." To the left of the tote was a 55-gallon drum of "Davies High Flash Mineral Spirits," which is used in the single parts washer in the building. No other waste was observed in the area. I observed numerous aerosol cans in the area and asked Mr. Schlaikowski how Therm-Tech manages the cans when they are empty. He said Therm-Tech does not manage them in any particular way, and instead just disposes the cans with regular trash.

At this point it was decided to drive to Therm-Tech's 1511 Pearl Street location. Mr. Malek and I drove in a separate car and followed Mr. Schlaikowski to Pearl Street.

Mr. Schlaikowski led us inside the west end of the Pearl Street building, a large processing area where Therm-Tech conducts air cooling, shot blasting, molten salt quenching, and maintains several additional Allcase furnaces. Much of the floor space in the building was empty, and Mr. Schlaikowski said Therm-Tech was hoping to install more production capacity in the coming years. I walked around the shot blast dust collectors and several shot blast dust drums in the area (See Photo 7). One of the dust drums was open and I observed a fine grey and brown dust inside.

The tour continued east through the Pearl Street location. In an area in the center of the building were two totes and one 55-gallon drum of used oil that were ready for off-site shipment (See Photos 8 and 9). The containers were labeled as "Waste Oil." Mr. Schlaikowski led us through a staging area that housed many containers of pieces waiting for treatment. Many of the pieces were oil and gas extraction equipment. Further east into the building was Therm-Tech's primary waste storage area. There were approximately 20 55-gallon drums of shot blast dust and five 55-

gallon drums of non-hazardous "High Heat Salt" deposits in the area, adjacent to a several large pieces of scrap metal (See Photos 10, 11 and 12). Many of the shot blast dust drums were stacked on one another. Both the drums of shot blast dust and salt deposits were dated, the majority of them within the past two months. At the easternmost side of the Pearl Street location was a locked gated area where Therm-Tech was storing old or unusable equipment and several vehicles. No waste material was observed in this area.

Mr. Schlaikowski, Mr. Malek and myself drove back to the Travis Lane location for a review of records. No hazardous wastes or universal wastes were observed during the site tour.

Record Review

After returning to the Travis Lane location, Mr. Malek and I joined Mr. Schlaikowski and Ms. Wiberg-Springer for a records review. I requested the following documents for review:

- . Therm-Tech's hazardous waste manifests and related land disposal restriction notification forms for the previous three years
- Annual hazardous waste reports as submitted to WDNR for the previous three years
- Waste characterization or determination records for Therm-Tech's waste streams
- Therm-Tech's contingency or emergency response plan
- Personnel training records for the previous three years
- Hazardous waste storage area inspection logs, if available

A diagram of the Therm-Tech facility can be seen in Attachment B.

After summarizing the records I would need to review, Ms. Wiberg-Springer explained that much of the materials were not readily available. She explained that Advanced Waste Services manages most the abovementioned records and that Therm-Tech would need to contact them in order to produce these documents. Additionally, some of the records requested were either wholly or partially computerized, including personnel training records, and would require some time to put them together. However, Ms. Wiberg-Springer did provide a copy of a bill of lading for a recent shipment of non-hazardous heat treat salt by Advanced Waste Services. The bill of lading displays the shipment of seven 55-gallon drums (4,000 pounds) of heat treat salts on 12/9/2014 from Therm-Tech's Pearl Street location. See Attachment C for this bill of lading.

Closing Conference

I summarized my review of the site to Ms. Wiberg-Springer, Mr. Schlaikowski, and several other Therm-Tech representatives. I mentioned that I did not see any hazardous waste during the tour, but until I reviewed previous manifests and other records, I could not fully evaluate Therm-Tech's compliance with RCRA at that time. I explained that depending on Therm-Tech's hazardous waste generator status, its hazardous waste management requirements can change drastically. I reminded them that I would need to see the abovementioned documents in order to complete my evaluation. However, I was able to comment on Therm-Tech's used oil management. I stated that the containers I viewed around the site, including drums and totes, need to be labeled as "Used Oil," for both the oil that is returned to Therm-Tech for reuse and the oil that is not. I also recommended that Therm-Tech utilize an aerosol can puncturer to empty its waste cans and sell them as scrap. I told Mr. Schlaikowski that I would likely have several

follow-up questions related to Therm-Tech's waste management practices. I stated the company would receive a report that would summarize the inspection and any issues that were identified.

The inspection ended around 11:30 AM.

Inspection Follow-Up

On January 14, 2015, the day after the inspection, I sent Mr. Schlaikowski a reminder and summary of the Therm-Tech records I would need to review in order to complete my evaluation. I requested that the documents be provided by email or regular mail.

On January 22, 2015, I sent Mr. Schlaikowski a second email with several questions regarding Therm-Tech's waste management practices, including questions related to the shot blast dust and the transfer of waste between the Travis Lane and Pearl Street locations.

On January 22, 2015, I received a package of documents from Ms. Wiber-Springer. The package contained Therm-Tech's annual hazardous waste report exemption forms to the WDNR for 2012 and 2013, hazardous waste manifests and other shipment documents, Therm-Tech's Emergency Response Plan, and employee training records.

Therm-Tech's 2012 and 2013 Annual Hazardous Waste Report Exemption Forms were completed by Sigma Environmental Services, Inc. In 2012, Therm-Tech reported a non-generator of hazardous waste but also stated that it was currently a Small Quantity Generator as of the date of the reporting, 2/25/2013. In the 2013 report, Therm-Tech reported again as a non-generator, and as of the date of the reporting on 1/28/2014, Therm-Tech was currently a non-generator. These documents can be seen in Attachment D.

Therm-Tech's most recent hazardous waste shipment occurred on 7/16/2014, and displays the removal of seven drums (385 gallons) of D002, D007 and D008 hydrochloric acid solution, and 15 drums (825 gallons) of D007 "tank bottom heat treat sludge," or the hazardous salt deposits in the wash tanks, from the Travis Lane location. The waste was transported by Advanced Waste Carriers to Badger Disposal in Milwaukee. The shipment on 7/16/2014 also included eight drums of non-hazardous heat treat salts, which were also transported to Badger Disposal. Ten drums of non-hazardous heat treat salts were also removed from Therm-Tech on 2/14/2014 by Advanced Waste Services, and another 22 drums were removed a few months prior on 11/8/2013. Only two hazardous waste shipment prior to the 7/16/2014 shipment were observed, including three drums of D007 waste sludge on 12/6/2011 and two drums of D007 sludge on 11/25/2011. The hazardous waste manifests are in Attachment E.

Therm-Tech's Emergency Response Plan includes on its cover page emergency phone numbers for the local police and fire department, WDNR numbers for violations and emergency spills, and gas and electric utilities. The plan itself describes evacuation procedures for facility work areas and emergency notification procedures for both employees and local authorities. The Emergency Response Plan is in Attachment F.

Therm-Tech provided a large selection of employee training plans, including training logs which list the courses taken by the employees, the dates they were completed, and the building in which

each employee worked. Training courses included personal protective equipment, fire safety, emergency evacuation procedures, hazard communication, and waste disposal procedures.

On January 27, 2015, Mr. Schlaikowski responded to my January 22 email and provided several documents from Connelly-GPM and PremierMetals that describe the use of Therm-Tech's shot blast dust as an ingredient in iron sponge. A letter describing the use of the shot blast dust and an MSDS of iron sponge are in Attachment G.

An inspection checklist is in Attachment H.

Attachments

A. Inspection Photographs
B. Facility Diagram
C. Bill of Lading for Heat Treat Salts
D. Annual Hazardous Waste Reports
E. Hazardous Waste Manifests
F. Emergency Response Plan
G. Shot Blast Dust Information
H. Inspection Checklist

ATTACHMENT A: Inspection Photographs

Photographs were taken by Brian Kennedy using a Canon PowerShot A2400 IS Digital Camera.

Photo 1: A dust collector collecting shot blast dust outside the southwest corner of Building 301.

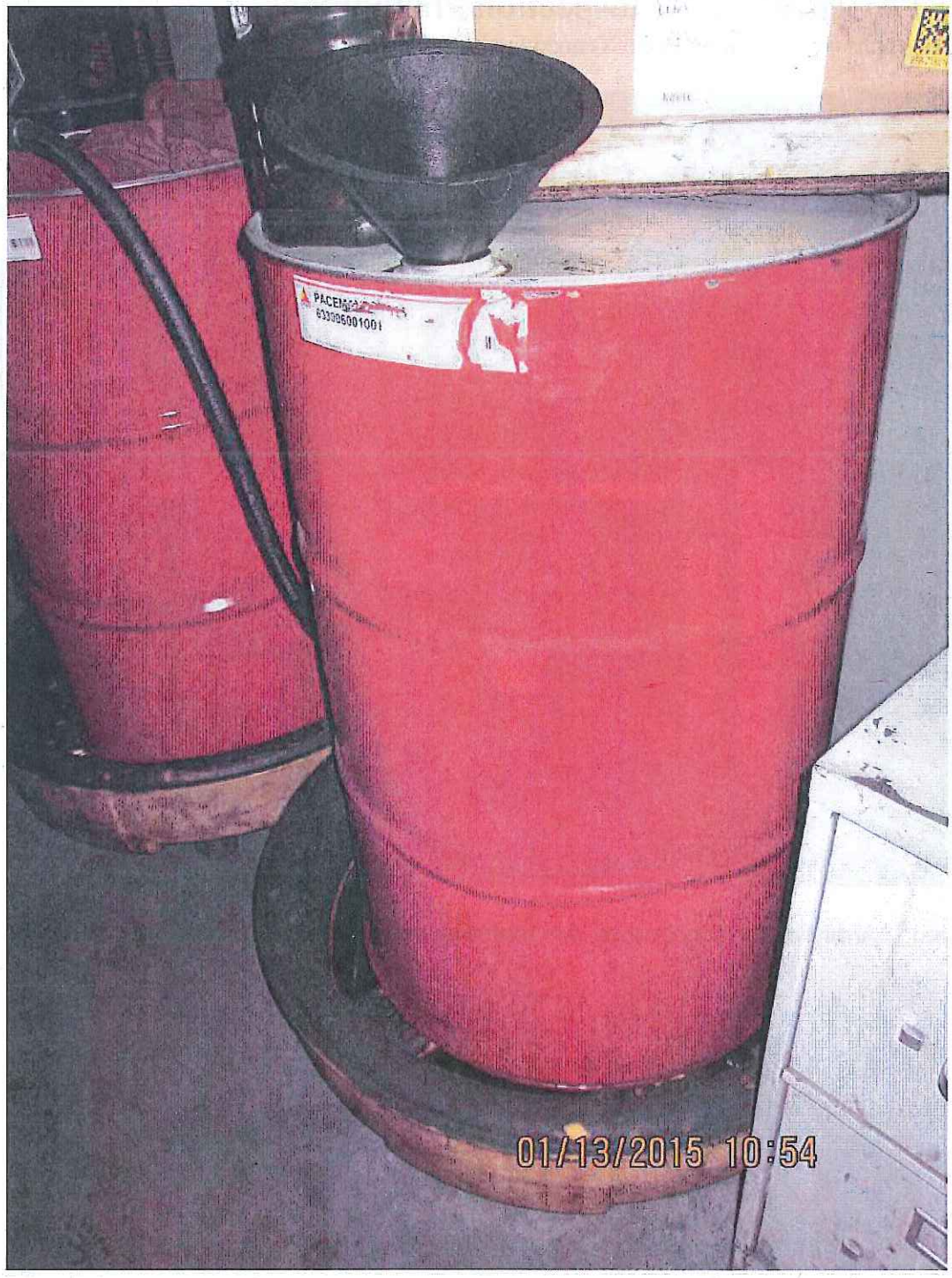


Photo 2: A 55-gallon drum collecting used oil near the vacuum furnaces in Building 305. The drum was not labeled as "Used Oil."

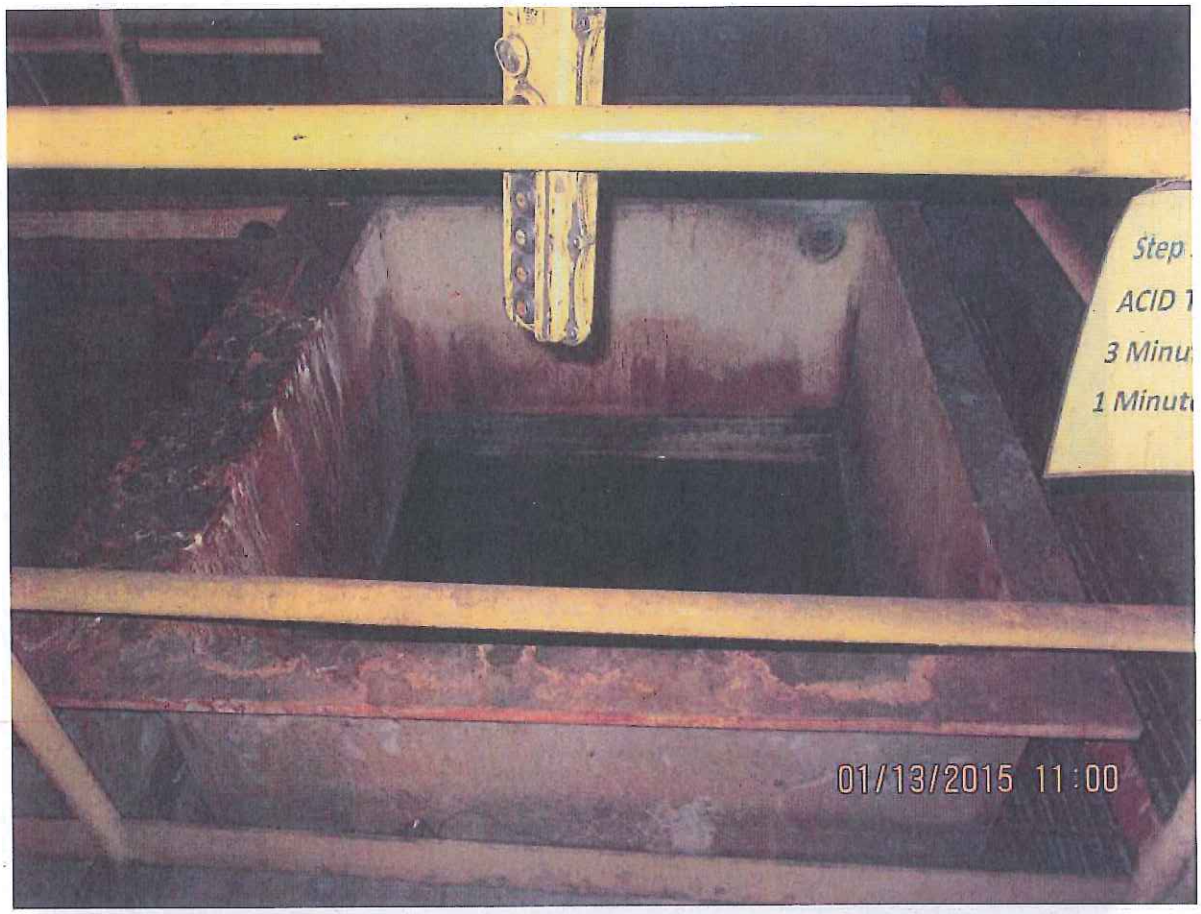


Photo 3: The acid etching tank near the nitriding process in Building 305. The caustic cleaning tank (not pictured) is to the left of this tank. All tanks were in an in ground concrete pit.

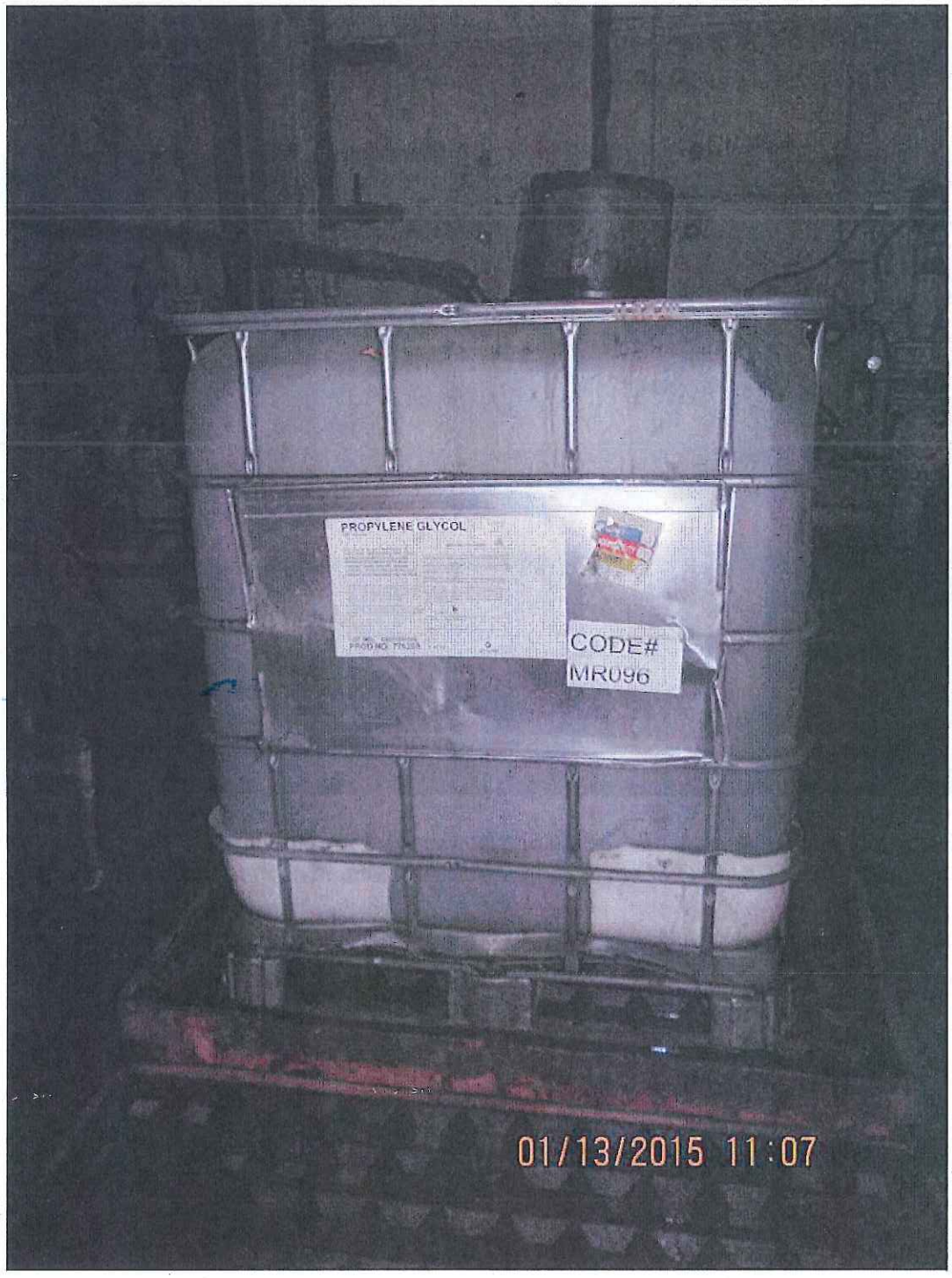


Photo 4: A tote of used oil collecting quench oil from the Allcase furnaces in Building 303. The tote was not labeled as "Used Oil."

Photo 5: A second tote of used oil collecting quench oil from the Allcase furnaces in Building 303. The tote was not labeled as "Used Oil."

Photo 6: A tote of used oil in the maintenance area in Building 211. The tote was not labeled as "Used Oil."

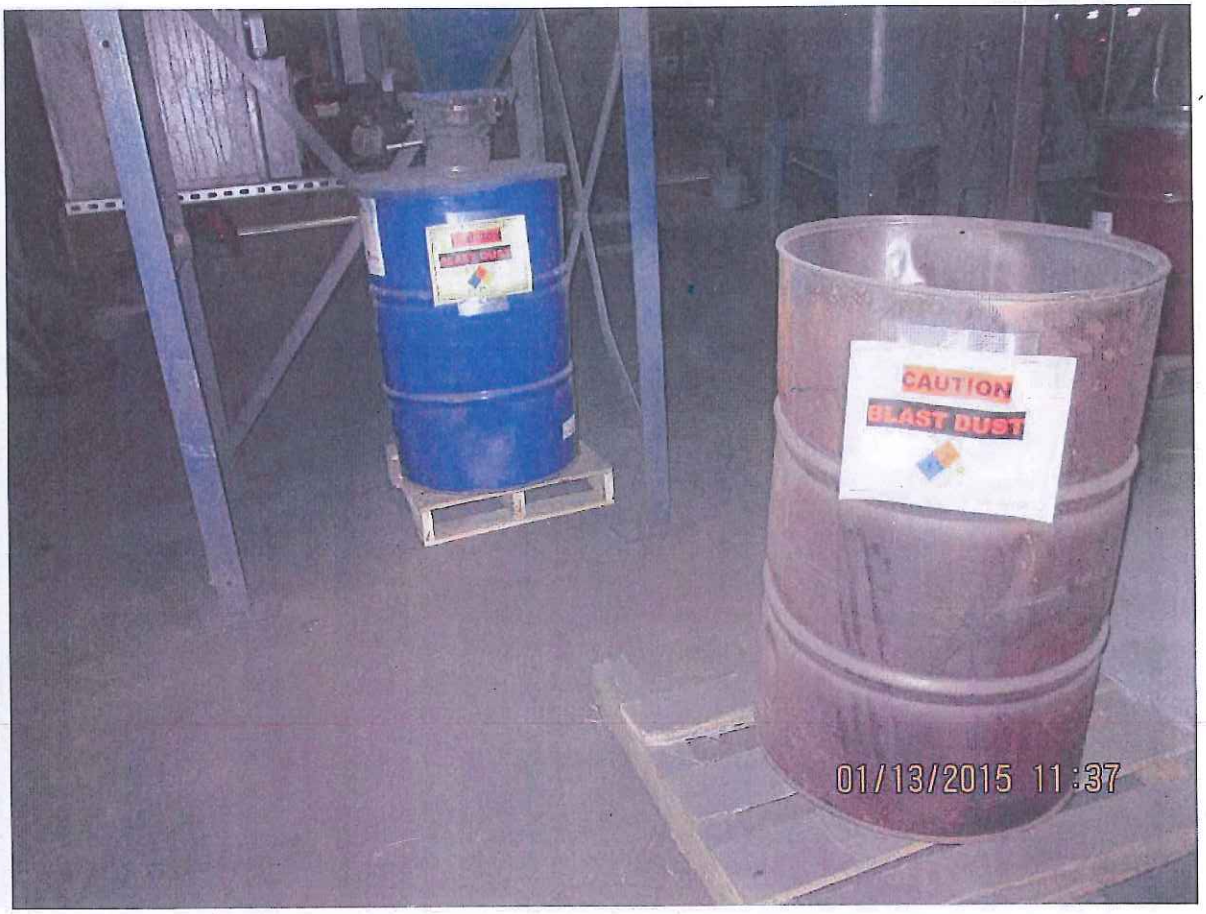


Photo 7: Two 55-gallon drums of shot blast dust at the Pearl Street location.

Photo 8: Two totes of used oil at the Pearl Street location. Neither tote was labeled as "Used Oil."

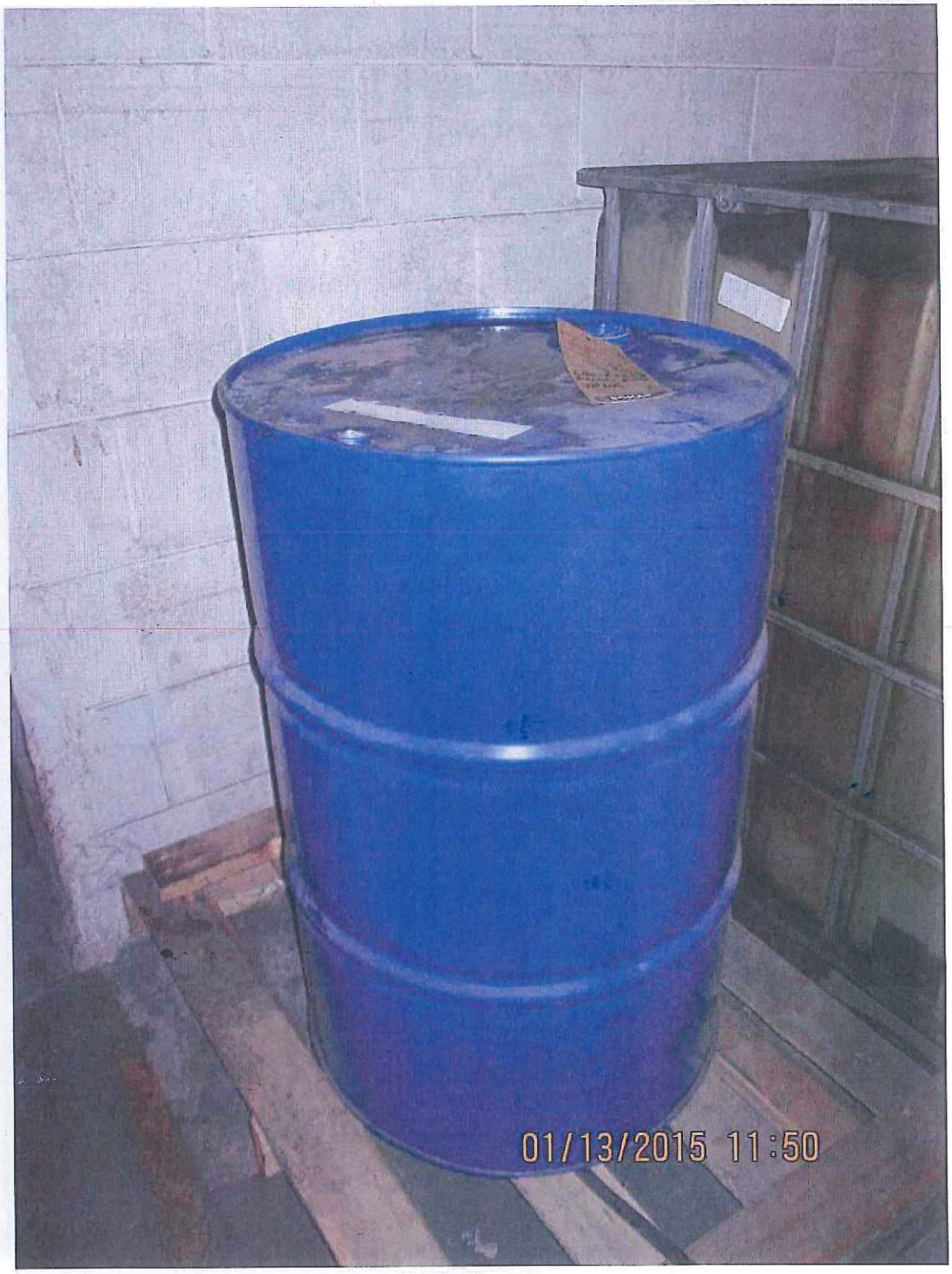


Photo 9: A 55-gallon drum of used oil at the Pearl Street location. The drum was not labeled as "Used Oil."

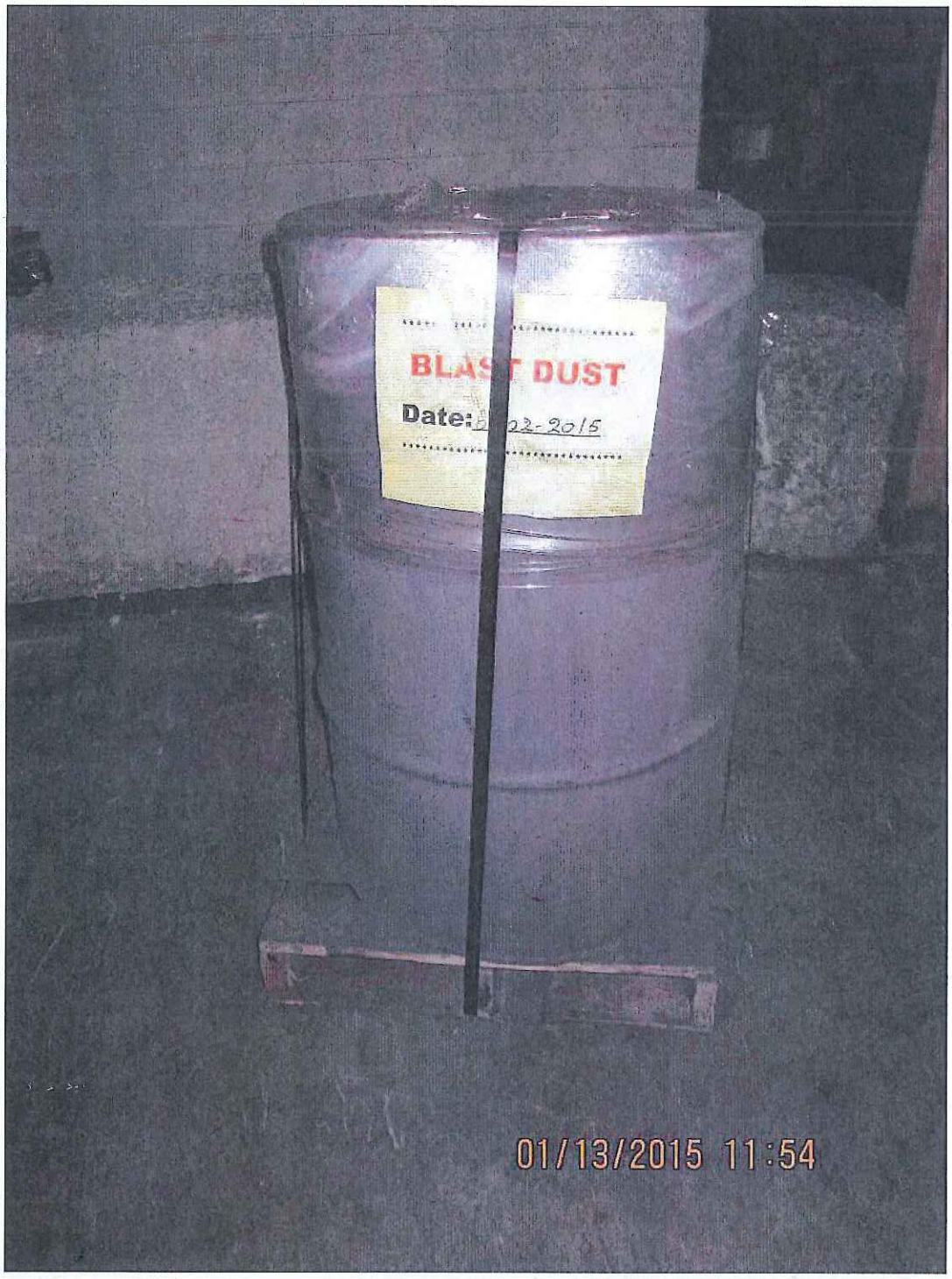
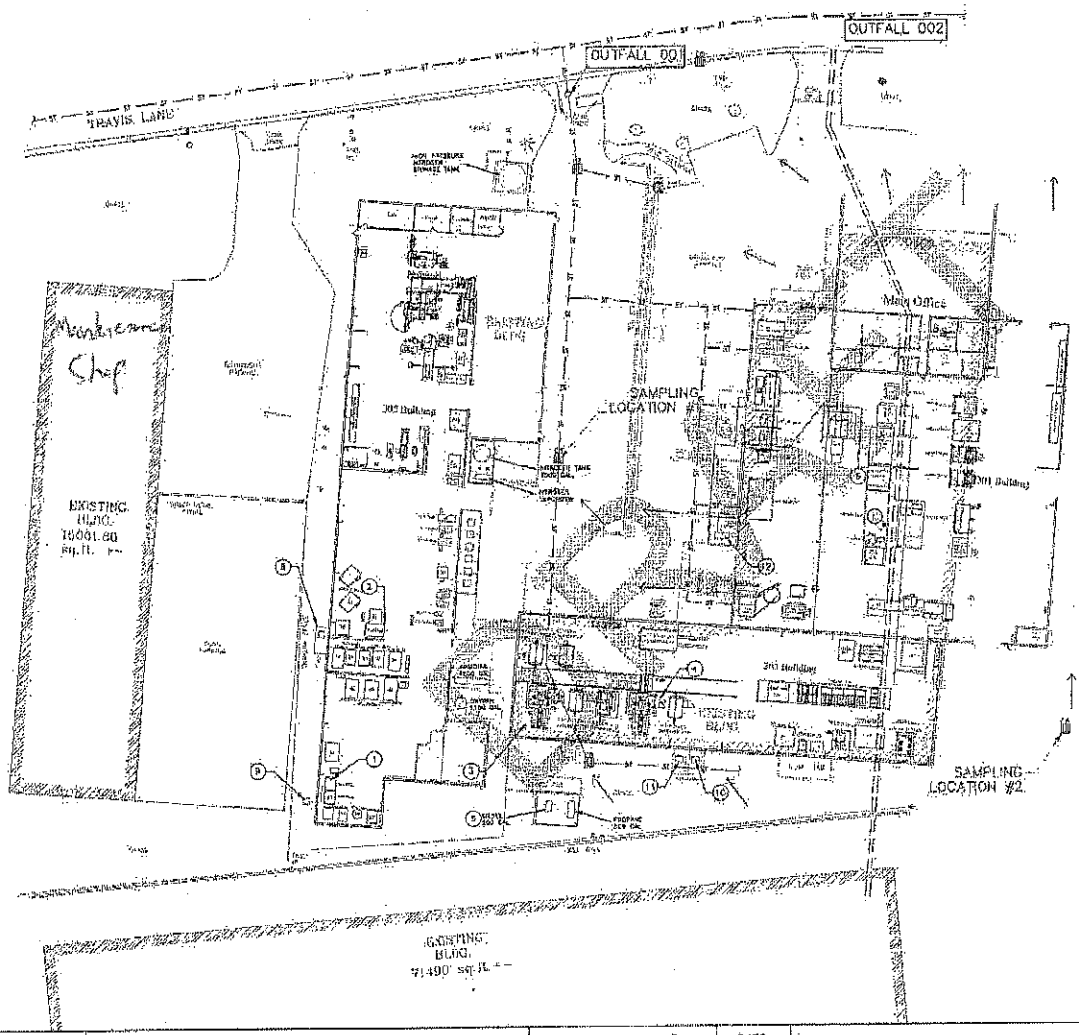


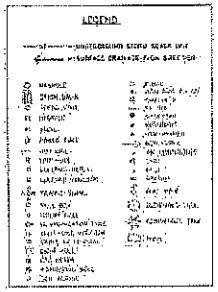
Photo 10: A 55-gallon drum of shot blast dust in the waste storage area at the Pearl Street location.

Photo 11: Five 55-gallon drums of "High Heat Salt" salt deposits in the waste storage area at the Pearl Street location.

Photo 12: Several of the approximately 20 55-gallon drums of shot blast dust in the waste storage area at the Pearl street location.

ATTACHMENT B: Facility Diagram





SPCC ID	Source Description	Capacity (Gallons)
1	Quench Tank adjacent to Tank #57 (305 Building)	1,375
2	Quench Tank for Furnace #11 (306 Building)	1,200
3	Quench Tank for Allcast Furnace #348 (303 Building)	5,400
4	Quench Tank for Allcast Furnace #341 (303 Building)	4,800
5	Diesel fueling tank (within 305 Building)	500
6	Quench Tank (301 Building)	1,400
7	Miscellaneous Drums throughout Buildings	55 each (5 to 10 drums)
8	Cooler for Furnace #11 Quench Tank (306 Building)	10
9	Cooler for Quench Tank, Adjacent to Tank #57 (305 Building)	6
10	Cooler for Quench Tank for Allcast Furnace #341 (303 Building)	15
11	Cooler for Quench Tank for Allcast Furnace #348 (303 Building)	15
12	Cooler for 301 Building Quench Tank (west side)	20

THE SIGMA GROUP
Right Source. Sound Solutions.
www.TheSigmaGroup.com
1300 West Canal Street
Milwaukee, Wisconsin, 53233
Phone: 414-643-4200
Fax: 414-643-4210

SCALE: 1"=40'
0' 20' 40' 80' 80'

NO	DATE	REVISIONS	BY	APVD

	NAME:	DATE:
DRAWN BY:	TPM	11/13/09
DESIGNED BY:		
CHECKED BY:		
APPROVED BY:		

THERMTECH

301 TRAVIS LANE, WAUKESHA, WISCONSIN

OIL STORAGE LOCATIONS

DRAWING NUMBER
10469-002

Figure 2

ATTACHMENT C: Heat Treat Salts Bill of Lading

Payment Document

1126 South 70th Street
Suite N408B
West Allis, WI 53214
www.advancedwasteservices.com
(414) 847-7100
Fax: (414) 475-4496

Date	12/9/2014
Invoice #	239263
Due Date	Upon receipt
PO #	
Results Advisor	Brushwood, //Harders
Phone Number	(262) 549-1878
Fax Number	(262) 549-4320
Memo	
Client Message	

Bill To

Attn: Alana
Therm Tech of Waukesha
301 Travis Lane
Waukesha WI 53186
United States

Ship To

Therm Tech of Waukesha
301 Travis Lane
Waukesha WI 53186

Therm Tech of Waukesha -Pearl St.	12/9/2014	10901	Disposal Non Heat Treat Salts 003157 -55dm	7	55 Gal. Dr...	72.00	504.00
Therm Tech of Waukesha -Pearl St.	12/9/2014		Transporation	1	Load	185.00	185.00

Total $689.00

Need to schedule a Load?
Call our Results Delivery Group at (866) 475-3110
or
Schedule a Load online @ www.advancedwasteservices.com.
Click on the Pickup Tab and place your order.

This Payment Document may reflect an increase in the fuel surcharge that is necessary to help us manage the recent increase in the market price for diesel fuel.

This Payment Document falls under Advanced Waste Services, Inc. Standard Terms & Conditions found at http://www.advancedwasteservices.com/client_resources.html unless superseded by another valid contract vehicle in place at the time these services were rendered.

Contact Advanced Waste Services at 800-842-9792 within 30 days of the invoice date for any and all billing discrepancies.

Transforming Today's Wastes Into Tomorrow's Resources!

We accept American Express, Mastercard, Visa and Diner's Club

The Industrial Waste Professionals™

Corporate Office
1126 South 70th Street, Suite N408B - West Allis, WI 53214
Phone: 800-642-9792 Fax: 414-475-3111

BILL OF LADING | 1. Shipper ID Number | 2. Page 1 of 1 | 3. Emergency Response Phone 800.442.9701 | 4. Tracking Number AWC 10901

SHIPPER

5. Shipper's Name and Mailing Address
Therm Tech of Waukesha
1511 Pearl St
Shipper's Phone: Waukesha WI 53186

Shipper's Site Address (if different than mailing address)

6. Transporter 1 Company Name
Advanced Waste Carriers, Inc.

U.S. EPA ID Number

7. Transporter 2 Company Name

U.S. EPA ID Number

8. Consignee Name and Site Address
Advanced Waste Services, Inc
1501 W. McKinley Ave
Facility's Phone: Milwaukee WI 53205

U.S. EPA ID Number

	9. Shipping Name and Description	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	
1.	Non-Regulated Material (Heat Treat Salts)	007	BA	4000	P	None PLACARD? YES ☐ NO ☐
2.						PLACARD? YES ☐ NO ☐
3.						PLACARD? YES ☐ NO ☐
4.						PLACARD? YES ☐ NO ☐

13. Special Handling Instructions and Additional Information
Line 1: Profile #00171

14. SHIPPER'S CERTIFICATION: I certify the materials are accurately described.
Shipper's/Offeror's Printed/Typed Name: [illegible] Signature: X [signature] Month 12 Day 09 Year 14

INTL

15. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter Signature (for exports only): Date leaving U.S.:

TRANSPORTER

16. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Michael Altmeyer Signature: [signature] Month 12 Day 09 Year 14
Transporter 2 Printed/Typed Name: Signature: Month Day Year

DESIGNATED CONSIGNEE

17. Discrepancy
17a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Bill of Lading Reference Number:

17b. Alternate Consignee (or Shipper)
U.S. EPA ID Number
Facility's Phone:

17c. Signature of Alternate Consignee (or Shipper) Month Day Year

18. Designated Receiving Facility Owner or Operator: Certification of receipt of materials covered by the bill of lading except as noted in Item 17a.
Printed/Typed Name: [illegible] Signature: [signature] Month 12 Day 10 Year 14

1126 South 70th Street
Suite N408B
West Allis, WI 53214
www.advancedwasteservices.com
(414) 847-7100
Fax: (414) 475-4496

Payment Document

Date	12/5/2014
Invoice #	238905
Due Date	Upon receipt
PO #	
Results Advisor	Brushwood, //Harders
Phone Number	(262) 549-1878
Fax Number	(262) 549-4320
Memo	
Client Message	

Bill To
Attn: Alana
Therm Tech of Waukesha
301 Travis Lane
Waukesha WI 53186
United States

Ship To
Therm Tech of Waukesha
301 Travis Lane
Waukesha WI 53186

Therm Tech of Waukesha -Pearl St.	12/5/2014		Analytical Fee -Oxidizer Screen, Compatibility ID 1411026-01	1	each	98.00	98.00

Total $98.00

Need to schedule a Load?
Call our Results Delivery Group at (866) 475-3110
or
Schedule a Load online @ www.advancedwasteservices.com.
Click on the Pickup Tab and place your order.

This Payment Document may reflect an increase in the fuel surcharge that is necessary to help us manage the recent increase in the market price for diesel fuel.

This Payment Document falls under Advanced Waste Services, Inc. Standard Terms & Conditions found at http://www.advancedwasteservices.com/client_resources.html unless superseded by another valid contract vehicle in place at the time these services were rendered.

Contact Advanced Waste Services at 800-842-9792 within 30 days of the invoice date for any and all billing discrepancies.

Transforming Today's Wastes Into Tomorrow's Resources!

We accept American Express, Mastercard, Visa and Diner's Club

Environmental
Monitoring and
Technologies, Inc.

8100 N. Austin Avenue Morton Grove, IL 60053-3203 P 847.967.6666 800.246.0663 F 847.967.6735 www.emt.com

Analytical Report

Bill Fowler
Advanced Waste Services, Inc.
1126 S. 70th Street, Suite N408B
West Allis, WI 53214

December 03, 2014

Work Order: 14K0918

RE: AWS Samples
Therm Tech - Saltbath

Dear Bill Fowler:

Enclosed are the analytical reports for the EMT Work Order listed. Also included with this analytical report is a copy of the chain of custody associated with these samples. If you have any questions, please contact me.

Sincerely,

Jessica Roe

Jessica Roe For Mark Steuer
Project Manager
847.967.6666
MSteuer@emt.com
Approved for release: 12/3/2014 5:00:30PM

Approved by,

Marilyn Krueding

Marilyn Krueding
Laboratory Director

The contents of this report apply to the sample(s) analyzed. No duplication is allowed except in its entirety.
Reporting limits are adjusted for sample size used, dilutions and moisture content, if applicable.

State of Wisconsin Dept of Natural Resources, Cert No. 999885890

Table of Contents

Environmental
Monitoring and
Technologies, Inc.

8100 N. Austin Avenue Morton Grove, IL 60053-3203 P 847.967.6666 800.246.0663 F 847.967.6735 www.emt.com

Sample Summary

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
1411026-01	14K0918-01	Solid	11/25/14 00:00	11/26/14 16:00

Environmental
Monitoring and
Technologies, Inc.

8100 N. Austin Avenue Morton Grove, IL 60053-3203 P 847.967.6666 800.246.0663 F 847.967.6735 www.emt.com

Case Narrative

Client:	Advanced Waste Services, Inc.	**Date:** 12/03/2014
Project:	AWS Samples	
	Therm Tech - Saltbath	
Work Order:	14K0918	

All reported results are within defined laboratory quality control objectives unless listed below or otherwise qualified in this report.

Work Order: 14K0918

The samples were received on 11/26/2014 4:00:00 PM . The samples arrived in good condition and properly preserved. The temperature of the cooler at receipt was 6 degrees C.

Refer to Qualifiers and Definitions for quality and analytical clarifications or deviations.

Environmental Monitoring and Technologies, Inc.

8100 N. Austin Avenue Morton Grove, IL 60053-3203 P 847.967.6666 800.246.0663 F 847.967.6735 www.emt.com

Client Sample Results

Client:	Advanced Waste Services, Inc.	**Client Sample ID:**	1411026-01
Project:	AWS Samples Therm Tech - Saltbath	**Report Date:**	12/03/2014
		Collection Date:	11/25/2014 00:00
Work Order:	14K0918	**Matrix:**	Solid
		Lab ID:	14K0918-01

Analyses	Result	EMT Reporting Limit	Qual	Units	Reg Limit	MDL	Date/Time Analyzed	Batch	Analyst	DF
Wet Chemistry										
Method: ASTM D4981-89										**Notes: H**
Oxidizers	Negative	0.00		Positive/ Negative		0.00	12/01/14 09:59	B4L0017	DZ1	1
Method: ASTM D5058-90										**Notes: H**
Acid Compatibility	Pass	0.00	X	Pass/Fail		0.00	12/02/14 13:03	B4L0112	SG	1
Base Compatibility	Pass	0.00	Xa	Pass/Fail		0.00	12/02/14 13:07	B4L0114	SG	1
Water Compatibility	Pass	0.00	Xb	Pass/Fail		0.00	12/02/14 13:00	B4L0111	SG	1

Environmental
Monitoring and
Technologies, Inc.

8100 N. Austin Avenue Morton Grove, IL 60053-3203 P 847.967.6666 800.245.0663 F 847.967.6735 www.emt.com

Dates Report

Client: Advanced Waste Services, Inc.
Project: AWS Samples
Therm Tech - Saltbath
Work Order: 14K0918

Report Date: 12/03/2014

Sample ID	Client Sample ID	Collection	Matrix	Test Name	Leached Prep Date	Prep Date	Analysis Date	Batch ID	Sequence
14K0918-01	1411026-01	11/25/14	Solid	Oxidizers, Screen		12/01/14 09:59	12/01/14 09:59	B4L0017	
				Compatibility, Water		12/02/14 13:00	12/02/14 13:00	B4L0111	
				Compatibility, Acid		12/02/14 13:03	12/02/14 13:03	B4L0112	
				Compatibility, Base		12/02/14 13:00	12/02/14 13:07	B4L0114	

Environmental
Monitoring and
Technologies, Inc.

8100 N. Austin Avenue Morton Grove, IL 60053-3203 P 847.967.6666 800.246.0663 F 847.967.6735 www.emt.com

List of Certifications

Code	Description	Number	Expires
AKDEC	State of Alaska, Dept. Environmental Conservation	UST-105	07/16/2015
CPSC	US Consumer Product Safety Commission, Accredited by PJLA Lab No. 1050	L14-56	04/30/2016
DoD	Department of Defense, Accredited by PJLA	L14-55	04/30/2016
ILEPA	State of Illinois, NELAC Accredited Lab No. 100256	003041	07/27/2015
ISO	ISO/IEC 17025, Accredited by PJLA	L14-56	04/30/2016
LELAP	State of Louisiana, NELAC Accredited Lab No. 171344	05015	06/30/2015
WDNR	State of Wisconsin Dept of Natural Resources	999888890	08/31/2015

Environmental
Monitoring and
Technologies, Inc.

8100 N. Austin Avenue Morton Grove, IL 60053-3203 P 847.967.6666 800.246.0663 F 847.967.6735 www.emt.com

Qualifiers and Definitions

Item	Description
H	Sample prepared and/ or analyzed past recommended holdtime.
X	Initial temperature-24.5 degree C,final temperature-23 degree C.No visible reaction.
Xa	Initial temperature-24.5 degreeC,final temperature-23.5 degreeC.No visible reaction.
Xb	Initial temperature-25 degreeC,final temperature-24 degreeC.No visible reaction.
%Rec	Percent Recovery

M.S.

ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

Chain of Custody Record

TURNARAOUND TIME:
☐ RUSH
4 day turnaround
☒ ROUTINE

8100 North Austin Avenue
Morton Grove, Illinois 60053-3203
847-967-6666
FAX: 847-967-6735
www.emt.com

Due Date: __-__-__ COC #: 139992

Company: AWS.
Address: 3801 W McKinley
MKE WI

Phone #: ( ) - Fax #: ( ) -
P.O. #: 51792 Proj. #:
Client Contact: Bill Fowler
Project ID / Location: Therm Tech - Saltbath, 1511 Read St

Sample Type:
1. Waste Water 2. Drinking Water 3. Soil 4. Sludge 5. Oil 6. Groundwater 7. Groundwater (filtered) 8. Other

Container Type:
P - Plastic V - VOC Vial O - Other G - Glass B - Tedlar Bag

Preservative:
1. None 2. H_2SO_4 3. HNO_3 4. NaOH 5. HCl 6. MeOH 7. Zn Ace 8. Other

Analyses: Oxidizer Screen ASTM 4981; Compatibility ASTM D5058

Sample I.D.	Sample Type	Container Size	Container Type	Container No.	Sampling By	Sampling Date	Sampling Time	pH	Temp.	Preservation Field	Preservation Lab	Oxidizer Screen ASTM 4981		Compatibility ASTM D5058									EMT USE ONLY — EMT WORKORDER # 1411098
1411026-01	4	QT	G	1	JB	11/25	—	—	—	NO		X		X									01A

Relinquished By:	Date / Time	Received By:	Date / Time
[signature]	Date: 11-26-14 Time: 1215	[signature]	Date: 11-26-14 Time: 1215
[signature]	Date: 11-26-14 Time: 1600		Date: - - Time: :
	Date: - - Time: :	Received For Lab By: [signature]	Date: 11-26-14 Time: 16:00

EMT USE ONLY
Client Code: AWS1
EMT Project I.D.: Laboratory Samples
Jar Lot No.

☒ SAMPLE RECEIVED ON ICE
☒ TEMPERATURE (Must be recorded if sampling was greater than 8 hrs. prior to sample receipt) 6

EMT SAMPLE RETURN POLICY ON BACK

SPECIAL INSTRUCTIONS:

EMTFIELDDOC2014001

ATTACHMENT D: Annual Hazardous Waste Reports

THE SIGMA GROUP
Single Source. Sound Solutions.

March 5, 2013

Project Reference #10469-005

Ms. Mary Wiberg-Springer
Therm-Tech of Waukesha, Inc.
301 Travis Lane
Waukesha, Wisconsin 53186

Re: 2012 Hazardous Waste Generator Report

Dear Ms. Wiberg-Springer:

Sigma Environmental Services, Inc. appreciated the opportunity to assist Therm-Tech of Waukesha, Inc. by completing the 2012 Hazardous Waste Generator report. The 2012 report was electronically submitted to the Wisconsin Department of Natural Resources on February 27, 2013. Enclosed please find the Hazardous Waste Report, confirmation of receipt, and supporting documentation for your records.

Please call me at (414) 643-4115 should you have any questions or require additional information.

Sincerely,

SIGMA ENVIRONMENTAL SERVICES, INC.

Nicole L. Braun

Nicole L. Braun
Project Engineer

Enclosures

THE SIGMA GROUP
Single Source, Sound Solutions.

February 27, 2013

Project Reference #10469-005

CERTIFIED MAIL

Hazardous Waste Reporting – WA/5
Wisconsin Department of Natural Resources
P.O. Box 7921
Madison, Wisconsin 53707-7921

Re: **2012 Hazardous Waste Report Certification**
Therm-Tech of Waukesha, Inc.
301 Travis Lane
Waukesha, WI
Facility ID #268232030

To Whom It May Concern:

Sigma Environmental Services, Inc., on behalf of Therm-Tech of Waukesha, Inc., is submitting the enclosed 2012 Hazardous Waste Report Certification. The 2012 Hazardous Waste Generator Report was electronically submitted to the Wisconsin Department of Natural Resources on February 27, 2013.

Please contact me at (414) 643-4115 if you have any questions or require additional information.

Sincerely,

SIGMA ENVIRONMENTAL SERVICES, INC

Nicole L. Braun
Project Engineer

Enclosure

State of Wisconsin
Department of Natural Resources
Bureau of Waste and Materials Management

Hazardous Waste Report 2012

Reporting Exemption Form

Hazardous Waste Reporting-WA/5
WI DNR
PO BOX 7921
Madison, WI 53707-7921

Site Name and Location

EPA ID :	WID988638856
Facility ID :	268232030
Site Name :	THERM TECH OF WAUKESHA INC
Site Location:	301 TRAVIS LN WAUKESHA, WI 53186

Primary NAICS Code : 332811

Mail Address :
301 TRAVIS LN
WAUKESHA, WI 53186

FACILITY OWNER INFORMATION

Facility Owner Name:	MARY BETH WIBERG-SPRINGER
Owner Start Date	5/15/1999
Facility Owner Type:	PRIVATE
Address	301 TRAVIS LANE
City,State Zip:	WAUKESHA, WI 53186
Country	UNITED STATES
Telephone # and Ext.:	262-549-1878

WASTE REPORT CERTIFIER INFORMATION

Name/Title	MARY BETH WIBERG-SPRINGER VICE PRESIDENT
Phone and Ext. /FAX	262-549-1878
Email Address	MbwsMary@aol.com
Address	301 TRAVIS LANE WAUKESHA WI 53189-7927

WASTE CONTACT INFORMATION

Name/Title	MARY BETH WIBERG-SPRINGER VICE-PRESIDENT
Phone and Ext. /FAX	262-549-1878
Email Address	MbwsMary@aol.com
Address	301 TRAVIS LANE WAUKESHA WI 53189-7927

WASTE REPORT PREPARER INFORMATION

Name/Title	NICOLE BRAUN PROJECT ENGINEER
Phone and Ext. /FAX	414-643-4115
Email Address	nbraun@thesigmagroup.com
Address	1300 W CANAL ST MILWAUKEE WI 53233

Hazardous Waste Activity

During 2012	Currently in 2013	Generator of Hazardous Waste	
		Large Quantity Generator	Generate in any calendar month 1,000 kg (2,205 lbs) or more of hazardous waste; or Generate in any calendar month, or Accumulate at any time, more than 1 kg (2.2 lbs) of acute hazardous waste or more than 100 kg (220 lbs) of acute hazardous waste spill cleanup material.
	X	Small Quantity Generator	Generate in every calendar month less than 1,000 kg (2,205 lbs) of hazardous waste; and Accumulate at all times no more than 6,000 kg (13,320 lbs) of hazardous waste; and Generate in every calendar month, and Accumulate at all times, no more than 1 kg (2.2 lbs) of acute hazardous waste and no more than 100 kg (220 lbs) of acute hazardous waste spill cleanup material.
		Very Small Quantity Generator	Generate in every calendar month no more than 100 kg (220 lbs) of hazardous waste; and Accumulate at all times no more than 1,000 kg (2,205 lbs) of hazardous waste; and Generate in every calendar month, and Accumulate at all times, no more than 1 kg (2.2 lbs) of acute hazardous waste and no more than 100 kg (220 lbs) of acute hazardous waste spill cleanup material.
X		Non generator	Generate no hazardous waste.

During 2012	Currently in 2013	
Yes / X No	Yes / X No	**Treater, Storer, or Disposer of Hazardous Waste at your site AND a Receiver of Hazardous Waste from Off-site**
		OR
Yes / X No	Yes / X No	**Treater, Storer or Disposer of Hazardous Waste at your site AND NOT a Receiver of Hazardous Waste from Off-site**
Yes / X No	Yes / X No	**Publicly Owned (Wastewater) Treatment Works (POTW) that accepts hazardous waste (via truck, rail, or dedicated pipe) for treatment, and complies with s. NR 670.001(3)(b)9.**
Yes / X No	Yes / X No	**Permanent Household and Very Small Quantity Generator Hazardous Waste Collection Facility that ships hazardous waste off-site to a licensed or permitted hazardous waste treatment, storage or disposal facility, or to a recycling facility**

Reason for not Generating

	Never generated		Periodic or occasional generator
	Out of business		Waste minimization activity
	Only excluded or delisted waste		Other (specify in comments below)
X	Only non-hazardous waste		

Reporting Exemption

X	For 2012 only	You have determined that 2012 reporting is not required, but you anticipate a change in hazardous waste activity during the next year that would place you in a category for which reporting is required. You will be sent materials for next years reporting
	Permanently	You do not anticipate a change in hazardous waste activity in the future that would place you in a category for which reporting is required. Upon verification of your status change request, you will NOT be sent materials for future reporting

Comments

Name: MARY BETH WIBERG-SPRINGER

Title: VICE PRESIDENT

Signature: Mary Beth Wiberg-Springer

Date of Signature: 2-25-2013

Gmail by Google

Hazardous waste report data received by WI DNR

DNRWasteManagement@wisconsin.gov <DNRWasteManagement@wisconsin.gov>
To: nbraun@thesigmagroup.com

Wed, Feb 27, 2013 at 2:15 PM

This email message acknowledges receipt of your 2012 hazardous waste report.

DNR received this information for 268232030 - THERM TECH OF WAUKESHA INC on 27-FEB-2013: 02:24. The hazardous waste Certification Form (or the Exemption Form if it was completed instead) must be downloaded and printed from the web reporting system. The name of the Waste Report Certifier that was reported in the Contact Types section will be preprinted on the form. That person should sign it, date it and send it to the DNR at the address listed on the form. If you have questions regarding this email, please call your regional hazardous waste contact. Thank you for your participation in using the web reporting system. We are interested in constructive feedback to improve this product. If you have comments, please email your comments to DNRWasteManagement@wisconsin.gov.

Bureau of Waste and Materials Management

Wisconsin Department of Natural Resources

March 17, 2014

Project Reference #10469-005

Ms. Mary Wiberg-Springer
Therm-Tech of Waukesha, Inc.
301 Travis Lane
Waukesha, Wisconsin 53186

Re: **2013 Hazardous Waste Generator Report**

Dear Ms. Wiberg-Springer:

The Sigma Group, Inc. appreciated the opportunity to assist Therm-Tech of Waukesha, Inc. by completing the 2013 Hazardous Waste Generator report. The 2013 report was electronically submitted to the Wisconsin Department of Natural Resources on February 28, 2014. Enclosed please find the Hazardous Waste Report, confirmation of receipt, and supporting documentation for your records.

Please call me at (414) 643-4115 should you have any questions or require additional information.

Sincerely,

THE SIGMA GROUP, INC.

Nicole L. Braun
Project Engineer

Enclosures

1300 West Canal Street | Milwaukee, WI 53233 | 414-643-4200 | 414-643-4210 | www.thesigmagroup.com

Hazardous waste report data received by WI DNR

DNRWasteManagement@wisconsin.gov Fri, Feb 28, 2014 at 12:31 PM
<DNRWasteManagement@wisconsin.gov>
To: nbraun@thesigmagroup.com

This email message acknowledges receipt of your 2013 hazardous waste report.

DNR received this information for 268232030 - THERM TECH OF WAUKESHA INC on 28-FEB-2014: 12:31. The hazardous waste Certification Form (or the Exemption Form if it was completed instead) must be downloaded and printed from the web reporting system. The name of the Waste Report Certifier that was reported in the Contact Types section will be preprinted on the form. That person should sign it, date it and send it to the DNR at the address listed on the form. If you have questions regarding this email, please call your regional hazardous waste contact. Thank you for your participation in using the web reporting system. We are interested in constructive feedback to improve this product. If you have comments, please email your comments to DNRWasteManagement@wisconsin.gov.

Bureau of Waste and Materials Management

Wisconsin Department of Natural Resources

THE SIGMA GROUP

February 28, 2014 Project Reference #10469-005

CERTIFIED MAIL

Hazardous Waste Reporting – WA/5
Wisconsin Department of Natural Resources
P.O. Box 7921
Madison, Wisconsin 53707-7921

Re: **2013 Hazardous Waste Report Certification**
Therm-Tech of Waukesha, Inc.
301 Travis Lane
Waukesha, WI
Facility ID #268232030

To Whom It May Concern:

The Sigma Group, Inc., on behalf of Therm-Tech of Waukesha, Inc., is submitting the enclosed 2013 Hazardous Waste Report Certification. The 2013 Hazardous Waste Generator Report was electronically submitted to the Wisconsin Department of Natural Resources on February 28, 2014.

Please contact me at (414) 643-4115 if you have any questions or require additional information.

Sincerely,

THE SIGMA GROUP, INC

Nicole L. Braun
Project Engineer

Enclosure

State of Wisconsin
Department of Natural Resources
Bureau of Waste and Materials Management

Hazardous Waste Report 2013

Reporting Exemption Form

Hazardous Waste Reporting-WA/5
WI DNR
PO BOX 7921
Madison, WI 53707-7921

Site Name and Location

EPA ID : WID988638656
Facility ID : 266232030
Site Name : THERM TECH OF WAUKESHA INC
Site Location: 301 TRAVIS LN
WAUKESHA, WI 53186

Primary NAICS Code : 332811

Mail Address :
301 TRAVIS LN
WAUKESHA, WI 53186

FACILITY OWNER INFORMATION

Facility Owner Name:	MARY BETH WIBERG-SPRINGER
Owner Start Date	5/15/1989
Facility Owner Type:	PRIVATE
Address	301 TRAVIS LANE
City,State Zip:	WAUKESHA, WI 53186
Country	UNITED STATES
Telephone # and Ext.:	262-549-1878

Waste Report Certifier Information

Name/Title	MARY BETH WIBERG-SPRINGER VICE PRESIDENT
Phone and Ext. /FAX	262-549-1878
Email Address	MbwsMary@aol.com
Address	301 TRAVIS LANE WAUKESHA WI 53189-7927

Waste Contact Information

Name/Title	MARY BETH WIBERG-SPRINGER VICE-PRESIDENT
Phone and Ext. /FAX	262-549-1878
Email Address	MbwsMary@aol.com
Address	301 TRAVIS LANE WAUKESHA WI 53189-7927

Waste Report Preparer Information

Name/Title	NICOLE BRAUN PROJECT ENGINEER
Phone and Ext. /FAX	414-643-4115
Email Address	nbraun@thesigmagroup.com
Address	1300 W CANAL ST MILWAUKEE WI 53233

Hazardous Waste Activity

During 2013	Currently in 2014	Generator of Hazardous Waste	
		Large Quantity Generator	Generate in any calendar month 1,000 kg (2,205 lbs) or more of hazardous waste; or Generate in any calendar month, or Accumulate at any time, more than 1 kg (2.2 lbs) of acute hazardous waste or more than 100 kg (220 lbs) of acute hazardous waste spill cleanup material.
		Small Quantity Generator	Generate in every calendar month less than 1,000 kg (2,205 lbs) of hazardous waste; and Accumulate at all times no more than 6,000 kg (13,320 lbs) of hazardous waste; and Generate in every calendar month, and Accumulate at all times, no more than 1 kg (2.2 lbs) of acute hazardous waste and no more than 100 kg (220 lbs) of acute hazardous waste spill cleanup material.
		Very Small Quantity Generator	Generate in every calendar month no more than 100 kg (220 lbs) of hazardous waste; and Accumulate at all times no more than 1,000 kg (2,205 lbs) of hazardous waste; and Generate in every calendar month, and Accumulate at all times, no more than 1 kg (2.2 lbs) of acute hazardous waste and no more than 100 kg (220 lbs) of acute hazardous waste spill cleanup material.
X	X	Non generator	Generate no hazardous waste.
Yes X No	Yes X No	Treater, Storer, or Disposer of Hazardous Waste at your site AND a Receiver of Hazardous Waste from Off-site OR	
Yes X No	Yes X No	Treater, Storer or Disposer of Hazardous Waste at your site AND NOT a Receiver of Hazardous Waste from Off-site	
Yes X No	Yes X No	Publicly Owned (Wastewater) Treatment Works (POTW) that accepts hazardous waste (via truck, rail, or dedicated pipe) for treatment, and complies with s. NR 670.001(3)(b)9.	
Yes X No	Yes X No	Permanent Household and Very Small Quantity Generator Hazardous Waste Collection Facility that ships hazardous waste off-site to a licensed or permitted hazardous waste treatment, storage or disposal facility, or to a recycling facility	

Reason for not Generating

	Never generated		Periodic or occasional generator
	Out of business		Waste minimization activity
	Only excluded or delisted waste		Other (specify in comments below)
X	Only non-hazardous waste		

Reporting Exemption

	For 2013 only	You have determined that 2013 reporting is not required, but you anticipate a change in hazardous waste activity during the next year that would place you in a category for which reporting is required. You will be sent materials for next years reporting
X	Permanently	You do not anticipate a change in hazardous waste activity in the future that would place you in a category for which reporting is required. Upon verification of your status change request, you will NOT be sent materials for future reporting

Comments

Name: MARY BETH WIBERG-SPRINGER Title: VICE PRESIDENT

Signature: Mary Beth Wiberg-Springer Date of Signature: 1-28-2014

ATTACHMENT E: Hazardous Waste Manifests

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

GENERATOR

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: [illegible]

2. Page 1 of 1

3. Emergency Response Phone: [illegible]2-9792 (AWC)

4. Manifest Tracking Number: 013148257 JJK

5. Generator's Name and Mailing Address: [illegible]

Generator's Site Address (if different than mailing address)

Generator's Phone: (262) 54[illegible]-1879 [illegible]

6. Transporter 1 Company Name: Advanced Waste Carriers, Inc. (AWC)

U.S. EPA ID Number: [illegible]

7. Transporter 2 Company Name

U.S. EPA ID Number

8. Designated Facility Name and Site Address: [illegible]

U.S. EPA ID Number: [illegible]

Facility's Phone: [illegible]

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	1. RQ, UN17[illegible], WASTE HYDROCHLORIC ACID SOLUTION, [illegible] (ERG#157)	007	DF	335	[illegible]	[illegible]	[illegible]	[illegible]
X	2. UN3082, Waste environmentally hazardous substances, liquid, n.o.s. (chromium), 9, III	015	DM	825	G	D007		
	3.							
	4.							

14. Special Handling Instructions and Additional Information

[illegible]

Profile #2: Tank Bottom Heat Treat Sludge

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: X Leon Coleman

Signature: X [signature]

Month 07 Day 16 Year 14

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:

Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Michael Altmayer

Signature: [signature]

Month 07 Day 16 Year 14

Transporter 2 Printed/Typed Name

Signature

Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator)

U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator)

Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name

Signature

Month Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

GENERATOR'S INITIAL COPY

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number WID988638656	2. Page 1 of 1	3. Emergency Response Phone 800-842-9792 (AWC)	4. Manifest Tracking Number 009364012 JJ

GENERATOR

5. Generator's Name and Mailing Address
Item Tech of Waukesha
251 Travis Lane
Waukesha, WI 53186

Generator's Site Address (if different than mailing address)

Generator's Phone: (262) 549-1378 Mark Schlakowski

6. Transporter 1 Company Name: Advanced Waste Carriers, Inc. (AWC)
U.S. EPA ID Number: WID000081538

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
Badger Disposal
5611 W Hemlock St
Milwaukee, WI 53223
Facility's Phone: 414-760-9175
U.S. EPA ID Number: WID988580056

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, NA3082, Hazardous Waste, Liquid, N.O.S., (Chrome), 9, PG III, (D007), (ERG# 171)	02	DM	110	G	D007
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
Profile #: W2014322-Waste Sludge w/Chrome PO#: 8892

Trailer #
Emergency Response Guide Sm-box
Site arrival time
Site departure time

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Mark Schlakowski Signature: [signature] Month: 11 Day: 25

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Russ Loehlein Signature: [signature] Month: 11 Day: 25 Y
Transporter 2 Printed/Typed Name Signature Month Day Y

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
18b. Alternate Facility (or Generator) Manifest Reference Number:
U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month Day Y
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name Signature Month Day Ye

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRE

Payment Document

1126 South 70th Street
Suite N408B
West Allis, WI 53214
www.advancedwasteservices.com
(414) 475-3100
Fax: (414) 475-4496

Date	12/6/2011
Invoice #	174954
Due Date	Upon receipt
PO #	5874
Results Advisor	Brushwood, James L
Phone Number	(262) 549-1878
Fax Number	(262) 549-4320
Memo	

Bill To

Attn: Alana
Therm Tech of Waukesha
301 Travis Lane
Waukesha WI 53186
United States

Therm Tech of Waukesha	12/6/2011	009364250	Disposal Haz Waste Non Bulk	3	55 Gal. Dr...	183.75	551.25
Therm Tech of Waukesha	12/6/2011		Transportation	1	Load	183.75	183.75

Total $735.00

Need to schedule a Load?
Call our Results Delivery Group at (866) 475-3110
or
Schedule a Load online @ www.advancedwasteservices.com.
Click on the Pickup Tab and place your order.

This Payment Document may reflect an increase in the fuel surcharge that is necessary to help us manage the recent increase in the market price for diesel fuel.

Contact Advanced Waste Services at 800-842-9792 within 30 days of the invoice date for any and all billing discrepancies.

Transforming Today's Wastes Into Tomorrow's Resources!

We accept American Express, Mastercard, Visa and Diner's Club

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 205

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WID988638656

2. Page 1 of 1

3. Emergency Response Phone: 800-842-9792 (AWC)

4. Manifest Tracking Number: 009364250 JJK

5. Generator's Name and Mailing Address:
Therm Tech of Waukesha
301 Travis Lane
Waukesha, WI 53186

Generator's Site Address (if different than mailing address)

Generator's Phone: (262) 549-1878 Mark Schlakowski

6. Transporter 1 Company Name: Advanced Waste Carriers, Inc. (AWC) — U.S. EPA ID Number: WID000815381

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address:
Badger Disposal
5611 W Hemlock St
Milwaukee, WI 53223

Facility's Phone: 414-760-9175 — U.S. EPA ID Number: WID988580056

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, NA3082, Hazardous Waste, Liquid, N.O.S., [Chrome], 9, PG III, (D007), (ERG# 171)	003	Dm	165	G	D007
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information

Profile #1: WS014522-Waste Sludge w/Chrome PO#: 5274

Trailer #
Emergency Response Guide On-board
Site arrival time
Site departure time

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Mark Schlakowski — Signature: [signature] — Month 12 Day 6 Year 11

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Chris Currier — Signature: [signature] — Month 12 Day 6 Year 11
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name — Signature — Month Day Year

GENERATOR / INT'L / TRANSPORTER / DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WID988638656
2. Page 1 of: 1
3. Emergency Response Phone: 800-842-9792 (AWC)
4. Manifest Tracking Number: 009364250 JJK

GENERATOR

5. Generator's Name and Mailing Address
Therm Tech of Waukesha
301 Travis Lane
Waukesha, WI 53186
Generator's Phone: (262) 549-1878 Mark Schlaikowski

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: Advanced Waste Carriers, Inc. (AWC)
U.S. EPA ID Number: WI0000815361

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
Badger Disposal
5611 W Hemlock St
Milwaukee, WI 53223
Facility's Phone: 414-760-9175
U.S. EPA ID Number: WID988580056

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, NA3082, Hazardous Waste, Liquid, N.O.S., [Chrome], 9, PG III, (D007), ERG# 171)	003	DM	165	G	D007
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
Profile #: WS014322-Waste Sludge w/Chrome PO#: 5874
Trailer #
Emergency Response Guide Onboard
Site arrival time
Site departure time

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Mark Schlaikowski Signature: Month 12 Day 6 Year 11

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Travis Cureton Signature: Month 12 Day 6 Year 11
Transporter 2 Printed/Typed Name: Signature: Month Day Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Sarah Wetten Signature: Month 12 Day 13 Year 11

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

Therm-Tech of Waukesha

301 Travis Lane
Waukesha, Wisconsin 53189
262-549-1878 fax 262-549-4320

Purchase Order No. 5874

PURCHASE ORDER

Vendor

Name Advanced Waste Services
Address 1126 S. 70th St. Suite N408B
City West Allis St WI ZIP 53214
Phone 800-842-9792 fax 414-475-4496

Ship To

Name Therm-Tech of Waukesha
Address 301 Travis Lane
City Waukesha St WI ZIP 53189
Phone 262-549-1878

Qty	Units	Description	Unit Price	TOTAL
3	bbl	waste sludge w/chrome (evap sludge)		$0.00

SubTotal
Shipping & Handling
Taxes State
TOTAL

Payment Details

- ○ Check
- ○ Cash
- ◉ Account No.
- ○ Credit Card

Name
CC #
Exp Date

Shipping Date

Approval

Mark Schlaikowski

Date 11/30/2011
Order No
Sales Rep
Ship Via

Notes/Remarks

ATTACHMENT F: Emergency Response Plan

ThermTech of Waukesha
Emergency Response Plan

Emergency Phone Numbers:

Fire Department:
Non-Emergency Phone: (262) 524-3651
Fax: (262) 524-3670
In an Emergency Call: 911

Police Department:
Emergency: 911
Non Emergency: 262-524-3831

DNR Wisconsin:
General Information: 1-888-936-7463
Violation Hotline: 1-800-847-9367
Emergency Spill Hotline: 1-800-943-0003

We Energy (GAS/Electric)
Electric emergencies and power outages
800-662-4797 — 24 hours a day
Do not use email.
Natural gas emergencies and leaks
800-261-5325 — 24 hours a day
Do not use email.

Intent and Purpose

The following Emergency Response Contingency Plan is for the entire ThermTech campus/facilities. The purpose of this plan is to protect the safety and welfare of the employees and the community in the event of an emergency response incident and to comply in every way with Federal and State laws pertaining to our facility operations with respect to preparedness and prevention of emergency events.

The Emergency Response Contingency Plan is intended as a guide of emergency procedures in the event of fire, spills, weather and medical events. This document is also intended as a reference source to familiarize employees with procedures and important contact information.

Emergency Internal Notification Process

In the event of an emergency at any of the ThermTech facilities, after clearing the immediate area of any and all personnel from the event, make an announcement on the page system (1654) as calmly as possible calling attention in the plant, what the emergency is, where it is located (building and specific area) and by name the Emergency Coordinator (on Crew Foreman or above are in this position).

Emergency Coordinators have been supplied with appropriate communication devices (cell phones) to alert them in the occurrence of an emergency. The Primary Emergency Coordinator will be contacted first; if they are not available the alternate Emergency Coordinators should be called in the order listed. Who the Primary contact is will depend on the time of the event.

The Emergency Coordinators have been selected based on their familiarity with the ThermTech facilities, the Emergency Response Contingency Plan, operation and activities at the facilities, the location and characteristics of possible dangers, the locations of records within the facilities and facility layouts.

TABLE OF CONTENTS

Contact List

Managers

Steve Wiberg Sr, President.....262-613-0530

Mary Wiberg-Springer, VP.....414-640-8719

Alana Riemer, HR.....414-881-3749

Kirk Springer, General Production Manager....262-844-2219

Mark Schlaikowski, Plant Engineer.....414-940-9245

Steve Rivett, Maintenance Manager.....262-358-1189

By Building

301, 303, & 305 Foreman:

Bill Gallagher, 1st shift.....262-853-8094

David Land, 2nd shift.....262-613-0838

Freddy Perez, 3rd shift.....262-613-0849

303 & 305 Plant Manager:

DJ Gallagher.....262-613-0796

Pearl Street Plant Manager:

Craig Springer.....262-613-0844

Pearl Street Foreman:

Brian Caswell, 1st shift.....262-613-0835

Brandon Medinger, 2nd shift.....262-988-6137

ThermTech Emergency Action Plan

Escape Routes

This document describes ThermTech's evacuation procedure. The procedure is divided into eight sections that describe when and how to evacuate, employee responsibility upon evacuation, and the notification of local emergency responders.

I. When is evacuation necessary?

a. When a fire moves beyond the incipient stage, involves flammable solvents, is uncontained and spread beyond 60 square feet, or is hidden behind a wall or ceiling and cannot be reached from a standing position.

b. If the fire creates smoke or other products of combustion that that make the use of respirators necessary.

c. If the fire is of a magnitude that makes it unapproachable within 15 feet or the effective range of the fire extinguisher or if you must crawl on the floor due to heat or smoke.

d. If the fire is not contained and fire, heat or smoke threatens to block your escape path.

e. If any pressurized tank is ruptured including nitrogen, ammonia, oxygen, propane or nitrous oxide.

f. **When to shelter in place**- In the event of a tornado, employees should remain in the building and take shelter in the designated tornado shelter areas. The tornado shelter areas are highlight on Map I below.

II. Evacuation Routes-Where to Exit

a. Employees should use the nearest exit that provides a clear, fire and smoke free path. Each work area contains one primary exit route that should be used unless that route is blocked. Each work area contains at least one secondary exit route in the event that the primary route is unusable.

I. Evacuation of Visitors

a. It is ThermTech's policy not to allow visitors to enter or tour the shop unless accompanied by a ThermTech employee(s). Therefore it is the accompanying employee(s) responsibility to guide any visitors to the nearest safe evacuation route and out of the building.

b. In the event of a tornado, the accompanying employee(s) is responsible for guiding any visitors to the nearest tornado shelter.

II. Meeting Areas

a. It is of critical importance that each employee and visitor is accounted for if an evacuation is necessary. Centralized and specific meeting areas are required to ensure this takes place.

b. Upon evacuation, each employee and visitor must go to ThermTech Doctors clinic parking area.

c. Any employee and/or visitor that are not accounted for will be considered to still be in the building(s). To prevent emergency services from looking for and attempting to rescue someone whom is already safe, it is of utmost importance that each employee come to the meeting area immediately.

d. Every employee is encouraged to help any injured parties reach the meeting area provided this act does not jeopardize their own safety.

III. Employee Count/Verification Responsibility: The senior supervisor for each respective building is responsible for taking a head count and verifying that each employee in his charge are accounted for. The senior supervisor is responsible for passing complete information on to emergency services upon their arrival. The supervisor should pass on the following information at a minimum:

a. Are all employees accounted for?

b. If someone is missing, who is missing a where are they assigned (where should they be)?

c. Any injuries that need treatment.

d. It is at the supervisors discretion if any other pertinent information should be passed on that is not included in the above list.

VI. Notification of Emergency Services (Fire Department)

a. Notification of emergency services is to be done using the 911 system

b. The responsibility of alerting emergency services is two-fold:

i. The employee who initiates the evacuation by alerting the plant with an emergency page must alert emergency services. The employee must not endanger himself while calling 911; this should be done from a safe location.

ii. The senior department supervisor must alert emergency services as back up to letter (i.) above. The second alert

iii. Is used in case the alerting employee is unable to safely access a phone.

VII. Securing Medical Assistance

a. Upon evacuation and employee count/verification, the senior supervisor must alert emergency services of any employee who has suffered an injury.
b. Employees trained in first aid are encouraged to assist injured employees. If assistance is being rendered, another employee must be dispatched to alert emergency services.

VIII. Critical Plant Shutdown: In the event of an evacuation, the first critical plant shutdown required is to close the main gas valve located on the northwest side of the 301 building. It is the responsibility of the 301 buildings senior supervisor under direction of Plant manager or above to close the valve.

Spills (salt): In the event that an overflow spill occurs, area of spill will be cordoned off immediately. Supervisor will be notified and they will assess the incident and if any other immediate actions are necessary. No one will be permitted to enter the cordoned off area until the supervisor deems the area safe, which will include salt cooling to a hardened state. This will ensure salt will not burn any personnel and salt will not spread further while still in a liquefied state.

Medical: In the event of a medical emergency no matter the severity, Supervisors are to be notified immediately and they will make the appropriate calls needed depending on the event.

Media: If contacted by members of the media, direct all their questions to Mary Springer.

ATTACHMENT G: Shot Blast Dust Information

CONNELLY – GPM, INC.

ESTABLISHED 1875
3154 SOUTH CALIFORNIA AVENUE CHICAGO, ILLINOIS 60608-5176
PHONE: (773) 247-7231 • www.ConnellyGPM.com • FAX: (773) 247-7239

Sent Via E-mail: DavidSamberg@aol.com

January 22, 2015

David Samberg
Premier Metals
317-727-6148

Re: Use of Therm Tech Iron Dust

Dear David:

As we discussed earlier, the Iron Dust you supply to us from Therm Tech is incorporated into our Connelly-GPM, Inc. Iron Sponge gas-purification product. The dust is mixed with wood shavings and oxidized into the surface of the wood. The wood acts as an inert carrier, and the iron oxide reacts to remove H_2S and mercaptans from gas sources (typical applications include natural gas wells, landfill and digester methane sources and air sources such as sewer lift stations).

The removal of these sulfur sources prevents pipe corrosion, engine corrosion, and the release of sulfur into the atmosphere (causing acid rain).

Please see the attached Iron Sponge Literature book and MSDS.

Sincerely,

Galen Dixon
Technical Director

Attach.

Material Safety Data Sheet

May be used to comply with OSHA's Hazard Communication Standard, 29 CFR 1910.1200 and Canadian Hazardous Protection Act and Controlled Products Regulation. Standard must be consulted for specific requirements.

U.S. Department of Labor
Occupational Safety and Health Administration
(Non-Mandatory From)
Form Approved
OMB No. 1218-0072

IDENTITY (As Used on Label and List) **IRON SPONGE (Label)**
Also known as IRON SPONGE, NOT SPENT
INTENDED USE: H_2S Removal from Gas

NOTE: Blank spaces are not permitted. If an item is not applicable or information unavailable, the space must be so marked.

Section I

Manufacturer's Name CONNELLY-GPM, INC.	Emergency Telephone Number (773) 247-7231
Address (Number, Street, City, State, and ZIP Code)	Telephone Number for Information (773) 247-7231
3154 South California Avenue Chicago, IL 60608-5176	Date REVISED 3/11/2013 Date Printed 4/16/2013
	Signature of Preparer (optional)

Section II - Hazardous Ingredients/Identity Information

Hazardous Components (Specific Chemical Identity; Common Name)		OSHA PEL	ACGIH	Canada TWAEV	LD50/ LC50
IRON OXIDE CAS #1309-37-1	(15-40%)	10mg/m^3	5mg/m^3	5mg/m^3	Not Avail.
SODIUM CARBONATE CAS #497-19-8	(1-5%)	No TLV Established			Not Avail.
CALCIUM CARBONATE; LIMESTONE	(1-5%)	15mg/m^3 TTL	10mg/m^3	10mg/m^3 TTL	Not Avail.
CAS #1317-65-3		5mg/m^3 Resp			

PRODUCT CLASSIFICATION: NON-HAZARDOUS, NO U.N. NUMBER NEEDED

SHIPPING CLASS: 50

Section III - Physical/Chemical Characteristics

Boiling Point Water	212°F	Specific Gravity (H_2O = 1)	0.7-0.9
Vapor Pressure (mm Hg)	N/A	Melting Point	N/A
Vapor Density (AIR = 1)	N/A	Evaporation Rate (Butyl Acetate = 1)	N/A

Solubility in Water
Insoluble

Apearance and Odor
Moist Brown Wood Chips with Wood Odor

Section IV - Fire and Explosion Hazard Data

Flash Point (Method Used)	Flammable Limits	LEL	UEL
Non-Flammable unless water is removed			

Extinguishing Media
Water, Sand, Dry Chemical, Universal Type Foam

Special Fire Fighting Procedures
None

Unusual Fire and Explosion Hazards
None

Section V - Reactivity Data

Stability	Unstable:		Contitions to Avoid: Do Not Allow to Dry Out
	Stable:	X	

Incompatibility (Materials to Avoid)

Incompatibility (Materials to Avoid)

Hazardous	May Occur		Contitions to Avoid:
Polymerization	Will Not Occur	X	

Section VI - Health Hazard Data

Route(s) of Entry	Inhalation?	Skin?	Ingestion?
	Yes	Yes	Yes (not likely)

Health Hazards (Acute and Chronic)

Inhalation, ingestion may irritate nose, mouth, throat, lungs, and stomach.
Product may irritate or burn eyes and cause skin irritation after prolonged contact.

Carcinogenicity:	NTP?	IARC Monographs?	OSHA Regulated
		NO INFORMATION AVAILABLE	

Signs and Symptoms of Exposure

Contact may cause eye or skin irritation. *Inhalation* may cause nose, mouth, throat, and/or lung irritation. *Ingestion* may cause mouth, throat, and/or stomach irritation.

Medical Conditions Generally Aggravated by Exposure

Any skin, eye, mucous membrane, or respiratory diseases sensitive to particulate dust.

Emergency First Aid Procedures

Eye Contact: Flush with water - get medical attention *Skin Contact:* Wash with water as soon as possible. *Inhalation*: Remove to fresh air. *Ingestion*: Drink large amounts of water. DO NOT INDUCE VOMITTING! GET MEDICAL ATTENTION

Section VII - Precautions for Safe Handling

Steps to Be Taken In Case Material is Released or Spilled

If the material is spilled, normal clean up procedures may be used.
Clean up personnel should be wearing the proper protective equipment.

Waste Disposal Method

Sanitary landfill, following Federal, State, and Local guidelines.

Precautions to Be Taken In Handling and Storing

Do not allow the material to dry out, as it will hinder performance and may cause a particulate dust problem.

Other Precautions

Not Applicable

Section VIII - Control Measures

Respiratory Protection (Specify Type)

Use NIOSH approved dust masks

Ventilation	Local Exhaust: If necessary	Special: Not Applicable
	Mechanical (General): Not Applicable	Other: Not Applicable

Protective Gloves	Eye Protection
Non-absorbent safety gloves	OSHA approved glasses/goggles

Other Protective Clothing or Equipment

Clothing that exposes as little skin as possible to the IRON SPONGE

Work/Hygenic Practices

Keep dusting to a minimum.

Section IX - Toxic Substances Control Act Regulations

IRON CAS #1309-37-1	XU (exempt)
SODIUM CARBONATE CAS #497-19-8	Not Listed
CALCIUM CARBONATE; LIMESTONE CAS #1317-65-3	Not Listed (This is pure calcium carbonate, not natural limestone)

Section X - Toxics Release Inventory

IRON CAS #1309-37-1	Not Listed
SODIUM CARBONATE CAS #497-19-8	Not Listed
CALCIUM CARBONATE; LIMESTONE CAS #1317-65-3	Not Listed (This is pure calcium carbonate, not natural limestone)

ATTACHMENT H: Inspection Checklist

Therm-Tech of Waukesha WID988638656 1/13/2015 BK

VERY SMALL QUANITY GENERATOR INSPECTION

Revision: 10/31/2011
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate less than 100 kg (220 lbs) of non acute hazardous waste in a calendar month or less than 1 kg (2.2 lbs) of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. A hazardous waste determination has been made on each solid waste generated (NR 662.011). Aerosol Can wastes	X	662.220(6)(a) Photo☐
B. The waste determination has been made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used (NR 662.011(3)).	✓	662.220(6)(a) Photo☐
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers (NR 662.011(3)(a)1.).	✓	662.220(6)(a) Photo☐
D. Waste is shipped to an approved or exempt facility.	✓	662.220(6)(e) Photo☐

Section 2: Manifest Requirements

A. Generator uses a manifest to ship hazardous waste. If NO, go to Section 3.	✓	Photo☐
B. Generator submitted a notification form and obtained an EPA identification number.	✓	662.220(6)(f)1 Photo☐
C. The manifest is used according to the instructions in the appendix to 40 CFR part 262 (NR 662.020(1)).	✓	662.220(6)(f)2 Photo☐
D. A facility that is permitted or licensed to accept the waste is designated on the manifest (NR 662.020(2)).	✓	662.220(6)(f)2 Photo☐
E. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility (NR 662.023(3)).	NA	662.220(6)(f)2 Photo☐
F. If the manifest copy signed by the receiving facility is not received in 60 days, a legible copy of the manifest indicating no confirmation of delivery was submitted to the department (NR 662.193(2)).	NA	662.220(6)(f)3 Photo☐
G. Generator retains a copy of the manifest signed by the generator until the signed copy from the designated facility is received (NR 662.040(1)).	✓	662.220(6)(f)4 Photo☐
H. A copy of each manifest is kept for at least three years from the date of shipment (NR 662.040(1)).	✓	662.220(6)(f)4 Photo☐

Section 3: On-Site Storage in Containers

A. Generator accumulates waste in containers. If NO, go to Section 4.	✓	Photo☐
B. The contents of a container that is leaking or in poor condition are transferred to another container in good condition (NR 665.0171).	NA	662.220(6)(c)1 Photo☐

BK

VERY SMALL QUANITY GENERATOR INSPECTION

Revision: 10/31/2011
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 3: On-Site Storage in Containers

C. Containers are made or lined with materials compatible with the waste (NR 665.0172).	✓	662.220(6)(c)1 Photo ☐
D. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)). Not observed	NA	662.220(6)(c)1 Photo ☐
E. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	NA	662.220(6)(c)1 Photo ☐
F. Containers are marked with the words, "Hazardous Waste". Not observed	NA	662.220(6)(c)2 Photo ☐

Section 4: Used Oil

A. Used oil is managed on-site. If NO, go to Section 5.	✓	 Photo ☐
B. Used oil containers and tanks are in good condition and not leaking.	✓	679.22(2) Photo ☐
C. Used oil containers and tanks are marked "used oil".	X	679.22(3)(a) Photo ☐
D. Transporter has an EPA ID number, except when the generator self-transports or has a tolling agreement.	✓	679.24 Photo ☐
E. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1 gallon of absorbent results from a non-routine spill.	NA	 Photo ☐
F. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	NA	679.23 Photo ☐
G. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	NA	679.11 Photo ☐

Section 5: Generator Status Evaluation

A. Less than the 220 lbs. (100 kg) of non-acute hazardous waste is generated in any month. Therm Tech is an episodic generator; no haz waste on site during inspection	✓	662.220(6) Photo ☐
B. Less than 2,205 lbs. (1000 kg) of non-acute hazardous waste is accumulated.		662.220(6)(b) Photo ☐
C. Describe other hazardous waste activities the generator is conducting at the facility.		 Photo ☐

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VERY SMALL QUANITY GENERATOR INSPECTION

Revision: 10/31/2011
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 5: Generator Status Evaluation

D. The Very Small Quantity Generator status is confirmed by this inspection.		
Therm Tech may change to higher status later in year		Photo ☐